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*Attorneys for Plaintiffs and the Class*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

JUAN QUINTANILLA VASQUEZ,  
GABRIELA PERDOMO ORTIZ, VICTOR  
HUGO CATALAN MOLINA, and KEVIN  
CALDERON, individually and on behalf of  
all others similarly situated,

**Plaintiffs,**

V.

LIBRE BY NEXUS, INC. and JOHN DOES  
1-50,

## Defendants.

| Case No. 4:17-cv-00755-CW

**DECLARATION OF JESSE NEWMARK  
IN SUPPORT OF PLAINTIFFS'  
MOTION FOR FEES, COSTS, AND  
SERVICE AWARDS**

Judge: Hon. Claudia Wilken

I, Jesse Newmark, declare:

1. I am an attorney admitted to practice before all Courts of the State of California, and counsel of record for Plaintiffs and the Class in this case. I have personal knowledge of all of the facts set forth in this Declaration unless otherwise stated, and I am competent to testify to these facts if called on to do so.

## **ORGANIZATION**

2. Founded in 1969, Centro Legal de la Raza (Centro Legal) is an Oakland-based nonprofit organization that has provided legal services to low-income and immigrant clients throughout Central and Northern California for more than fifty years. Our work includes direct legal services, impact litigation, policy advocacy, and community outreach and education, for the rights of immigrants, workers, tenants, and consumers. We have more than forty attorneys and advocates who represent thousands of low-income and immigrant clients each year.

## **EXPERIENCE**

3. I have practiced law in California for about fifteen years, since graduating from Harvard Law School in 2006. I have completed two federal clerkships, for Judge Richard A. Paez on the U.S. Ninth Circuit Court of Appeals, and Judge Dean D. Pregerson for the Central District of California. I have been the litigation director at Centro Legal since 2013, where I manage Centro Legal's affirmative and impact litigation docket across our program areas.

4. I have been certified as class counsel in state and federal court, in class actions for low-income and immigrant class members like those here. See Gonzalez v. Sessions, 325 F.R.D. 616, 625 (N.D. Cal. 2018), aff'd, Aleman Gonzalez v. Barr, 955 F.3d 762, No. 18-16465, 2020 WL 1684034 (9th Cir. 2018) ("The four attorneys at Centro Legal . . . have experience litigating complex immigration cases."); United States ex rel. Terry v. Wasatch, 327 F.R.D. 395, (E.D. Cal. 2018), petition to appeal denied, No. 18-80091, 2018 WL 6118456 (9th Cir. 2018) ("Counsel's credentials reflect long-standing advocacy for low-income tenants and sufficient familiarity with class action litigation."); Navarrete v. Burma Superstar Oakland, Inc., No. RG16830336 (Alameda County Super. Ct. 2016) (certifying class counsel and granting final approval of \$1.3 million settlement for low-wage and immigrant restaurant workers).

1       5. I am lead counsel for Centro Legal in several other ongoing class actions for low-  
 2 income and immigrant clients. See Brown v. Upside Gading, LP, No. RG18928503 (Alameda  
 3 County Super. Ct. 2018), 42 Cal.App.5th 140 (2019); Cruz v. Las Montañas, No. MSC17-00330  
 4 (Contra Costa County Super. Ct. 2017); Portillo-Cardoza v. Fox, No. RG16843364 (Alameda  
 5 County Super. Ct. 2016).

6       6. I have also successfully represented and continue to represent low-income and  
 7 immigrant clients in complex and multi-plaintiff actions in state and federal court. See, e.g.,  
 8 Lopez v. Jaber, No. RG15772595 (Alameda County Super. Ct. 2015) (\$2 million settlement in a  
 9 complex habitability action); Mancilla v. Abundis, No. RG19030501 (Alameda County Super.  
 10 Ct. 2019); Campana v. Hileman, No. RG19024346 (Alameda County Super. Ct. 2019); Gonzalez  
 11 v. Cam Huong, Inc., No. RG18892554 (Alameda County Super. Ct. 2018); Araiza v. Rockwell  
 12 Drywall, Inc., Nos. 18CV323572, 18CV323583 (Santa Clara County Super. Ct. 2018); City of  
 13 Oakland v. Lee, No. RG1889710 (Alameda County Super. Ct. 2018); Sanchez v. Leong, No.  
 14 RG18916383 (Alameda County Super. Ct. 2018); Cortez v. Choice Hotels Int'l, Inc., No.  
 15 RG17847671 (Alameda County Super. Ct. 2017); Alvarez v. Hernandez, No. RG17883958  
 16 (Alameda County Super. Ct. 2017); Baños v. Polymeric Tech. Inc., No. RG16834861 (Alameda  
 17 County Super. Ct. 2016); Garcia v. Dominguez, No. 3:14-cv-02271 (N.D. Cal. 2014); Navarijo-  
 18 Arevalo v. Capital Bldg. Maint., No. RG14747820 (Alameda County Super. Ct. 2014); Pinto v.  
 19 Laundry Express, Inc., No. RG14715334 (Alameda County Super. Ct. 2014).

20       7. I previously worked as a Deputy City Attorney for the City of Oakland, where I  
 21 was lead counsel for the City in complex cases on behalf of low-income and immigrant tenants  
 22 and victims of immigration fraud. See City of Oakland v. Am. Legal Servs., No. RG10496098  
 23 (Alameda County Super. Ct. 2013) (civil action for injunctive relief, penalties, and restitution for  
 24 hundreds of low-income immigrants defrauded by an immigration consultant firm, resulting in a  
 25 \$15.1 million judgment); People v. Avalon Success, LLC, No. RG09455940, 2010 WL 4919588  
 26 (Alameda County Super. Ct. 2010) (civil action for hundreds of low-income and immigrant  
 27 tenants facing violations of state and local housing laws, with a final judgment providing  
 28 extensive injunctive relief).

1       8.     These and other cases have resulted in significant injunctive relief and important  
 2 legal decisions for low-income and immigrant communities like those in this case.

3       9.     I first worked at Centro Legal as an attorney and Skadden Fellow, representing  
 4 low-income consumers, tenants, and workers, as well as clients in immigration court.

5       10.    I have published articles discussing litigation and advocacy for low-income and  
 6 immigrant clients and communities. See, e.g., Newmark, Legal Aid Affairs: Collaborating with  
7 Local Governments on the Side, 21 B.U. Pub. Int. L.J. 195 (2012). I also present at trainings on  
 8 immigrants' rights law and class action litigation, such as the Impact Fund's Class Action  
 9 Training Institute and the Public Rights Projects' panel on affirmative litigation.

10      11.    Through this decade of specialized legal work, I have particular expertise in the  
 11 complex procedural and substantive areas of law at issue in this case, including the interrelation  
 12 of federal, state, and local laws and contracts on low-income and immigrant communities.

13      12.    Aidin Castillo is the directing attorney for Centro Legal's immigrants' rights  
 14 program. Ms. Castillo graduated from UC Davis School of Law in 2011.

15      13.    For almost 10 years, Ms. Castillo has devoted her time exclusively to representing  
 16 low-income and immigrant clients.

17      14.    Ms. Castillo is an expert in all aspects of immigration law, including the legal  
 18 issues surrounding immigration bonds and removal defense at issue in this case.

19      15.    Through this work, Ms. Castillo is regularly involved in regional and national  
 20 impact litigation and policy advocacy.

21      16.    Ms. Castillo is also part of an extended network of immigrants' rights  
 22 practitioners engaged in direct legal services, impact litigation, and policy advocacy.

23      17.    Ms. Castillo has successfully litigated numerous cases in immigration courts and at  
 24 the Board of Immigration Appeals.

25      18.    Ms. Castillo regularly conducts immigration law trainings for staff attorneys, pro  
 26 bono attorneys, and law students. As the directing attorney for immigrants' rights at Centro Legal,  
 27 she also supervises a staff of over 30 people, including attorneys, paralegals, and legal assistants, on  
 28 their legal work.

1       19. Before coming to Centro Legal, Ms. Castillo worked at the Immigrant Legal  
 2 Resource Center, a national organization renowned for expertise in immigration law. During this  
 3 time, Ms. Castillo conducted dozens of statewide, regional, and national trainings for judges,  
 4 attorneys, and other legal advocates, on a variety of immigration law topics, including those at  
 5 issue in this case. She co-authored and edited numerous immigration law training manuals,  
 6 practice advisories, and other secondary sources on a wide range of immigration topics.

7       20. Ms. Castillo also previously worked as a policy attorney in Washington D.C.,  
 8 writing federal immigration legislative proposals for Congress and policy proposals to the office  
 9 of U.S. Citizenship & Immigration Services, to protect immigrants from increased immigration  
 10 enforcement actions that would result in prolonged immigration detention.

11       21. Ms. Castillo makes extensive use of this decade of specialized experience and  
 12 training to provide support to immigrant clients and class members, as she has done in this case.

#### **ATTORNEYS' FEES AND COSTS**

14       22. I have worked extensively on this case, along with Ms. Castillo and other Centro  
 15 Legal staff, since the end of 2016. Centro Legal has been actively involved in all aspects of the  
 16 litigation in the almost four years since then.

17       23. Specifically, Centro Legal attorneys took a lead role on critical aspects of the  
 18 case, including: (1) coordinating client meetings, declarations, and other communications and  
 19 support; (2) preparing and defending Plaintiffs and their sponsors at depositions; (3) reviewing  
 20 and correcting deposition transcripts; (4) translating documents and verbal communications as  
 21 needed throughout the litigation; (5) investigating facts by conducting outreach to and  
 22 responding to inquiries from numerous unnamed Class Members and non-parties; (6) negotiating  
 23 the highly complex and multi-faceted injunctive relief in this action; (7) preparing settlement  
 24 term assessments, damage audits, and distribution models to determine the impact of proposed  
 25 terms on the thousands of Class Members nationwide, and revising these audits, assessments,  
 26 and models, based on new data, proposals, and Class Member information provided by  
 27 Defendant over the years of negotiations; (8) reviewing and assessing Defendant's policy  
 28 changes outside of settlement over the course of the litigation, including new English and

1 Spanish-language contracts and program documents; (9) researching legal and factual issues as  
 2 to the immigration removal, detention, and bond systems in particular; (10) drafting briefs and  
 3 presenting oral argument in successfully opposing Defendant's motions to dismiss and compel  
 4 arbitration, particularly as to Plaintiffs' legally complex and fact-intensive state law theories  
 5 opposing arbitration based on fraud and unconscionability; (11) preparing and responding to  
 6 various record requests; (12) conducting written and verbal communications with Defendant,  
 7 opposing counsel, mediators, and the court on various matters; (13) drafting administrative  
 8 motions; (14) researching and drafting memoranda on important legal and factual issues,  
 9 including arbitration agreements, immigration status inquiries in discovery, asylum  
 10 confidentiality laws, Plaintiffs' state law claims generally, and equitable tolling of Plaintiffs'  
 11 claims under California Civil Code section 1632; (15) drafting requests for production of  
 12 documents as to arbitration agreements; (16) drafting mediation briefs and researching  
 13 mediators; (17) consulting with various experts on complex legal and policy issues; (18) drafting  
 14 the settlement agreement; (19) researching a potential motion to enforce; (20) drafting Centro  
 15 Legal's attorney declarations and working with Plaintiffs to draft their declarations in support of  
 16 preliminary approval and this application; (21) researching and drafting the settlement  
 17 assessment and service award sections in particular, in support of preliminary approval and this  
 18 application; and (22) drafting the supplemental brief and revised documents in support of  
 19 preliminary approval. Although we have not billed for this time, our immigration attorneys also  
 20 devoted many hours to representing Plaintiffs in their immigration proceedings.

21       24.     Centro Legal attorneys also participated in: (1) drafting the initial and amended  
 22 complaints in this action; (2) investigating related cases; (3) reviewing and revising briefs,  
 23 stipulations, and other documents drafted and filed in this matter; (4) preparing for Defendant's  
 24 30(b)(6) deposition; (5) the many negotiations, mediations, and other meetings with Defendant  
 25 and opposing counsel; (6) the various court hearings; and (7) reviewing the thousands of pages  
 26 of documents produced in discovery and in response to records requests.

27       25.     We tracked our hours spent on this case using attorney billing software. All staff  
 28 contemporaneously recorded the time they spent working on this case. For each task performed,

1 staff accounted for their time in 1/10th of an hour (6-minute) increments or shorter, and included  
 2 a brief narrative description of the work performed. Staff did not “block bill.”

3 26. I generated a report summarizing each staff member’s billable time spent on this  
 4 case through August 31, 2020.

5 27. I reviewed the time entries, and believe the hours expended were reasonable and  
 6 necessary to securing the result in this case. I also exercised billing judgment by excluding time  
 7 from non-attorney support staff, law students, and other volunteers.

8 28. To avoid unnecessary public disclosures, I redacted certain entries to state only  
 9 “fact investigation” or “consultation” for entries that referenced, for instance, interviews with  
 10 unnamed Class Members or consultations with non-parties.

11 29. I have attached a true and correct copy of the time entries as Exhibit A.

12 30. Centro Legal calculated its lodestar using the hourly rates established by the LSI  
 13 Laffey Matrix. I am informed and believe that the Laffey Matrix establishes hourly rates for  
 14 attorneys and legal staff based on the prevailing market rates in Washington D.C. Based upon  
 15 recent fee awards to San Francisco Bay Area attorneys in similar class action cases, my  
 16 understanding is that the Laffey Matrix hourly rates are at or below market for the Bay Area.

17 31. The following table represents the time spent by the Centro Legal attorneys on  
 18 this case through August 31, 2020, with a total lodestar value of \$561,820.36:

Name	Title	Years (JD)	Hours	Rate	Lodestar
Jesse Newmark	Litigation Director	15	489.08	\$759	\$371,214.25
Aidin Castillo	Directing Attorney	10	118.05	\$672	\$79,329.60
Alison Pennington	Managing Attorney	18	55.85	\$759	\$42,390.15
Shira Levine	Senior Attorney	9	99.57	\$672	\$66,910.11
Ana Henderson-Arjona	Staff Attorney	4	4.25	\$465	\$1,976.25
<b>Totals</b>			<b>766.80</b>		<b>\$561,820.36</b>

26 32. I anticipate that Centro Legal will devote substantial additional time to this case after  
 27 August 31, 2020, including: (1) finalizing this application; (2) preparing for and attending the final  
 28 approval hearing; (3) monitoring the claims and distribution process; (4) corresponding with the

1 claims administrator; (5) managing the extended payment plan; (6) ensuring compliance with the  
 2 injunctive relief; and (7) responding to Class Member inquiries.

3       33. As a nonprofit legal services provider, Centro Legal does not charge our clients,  
 4 including Plaintiffs or the Class in this action, any fees for our services. Centro Legal therefore  
 5 relies on awards for attorneys' fees and costs in order to continue its work on behalf of low-  
 6 income and immigrant clients, to enforce their legal rights. Centro Legal invested the substantial  
 7 attorney and staff time described above with no guarantee that any fees would be recovered. All  
 8 attorneys' fees and costs awarded to Centro Legal will be used to fund the nonprofit  
 9 organization's ongoing work representing low-income and immigrant clients who would not  
 10 otherwise have access to legal representation.

#### **SERVICE AWARDS**

12       34. As Plaintiffs describe in detail in their own declarations, they took on significant  
 13 personal risks and particular hardships in bringing and litigating this action.

14       35. Plaintiffs also invested substantial time and effort in this litigation, staying  
 15 actively involved over the past almost four years to obtain critical injunctive and monetary relief  
 16 for the Class.

17       36. Plaintiffs provided critical assistance by: (1) helping counsel investigate the facts  
 18 and claims in the case; (2) meeting in-person with counsel on numerous occasions, including to  
 19 draft the initial and amended complaints, respond to discovery requests, and prepare  
 20 declarations; (3) attending depositions, after extensively preparing for them with counsel at in-  
 21 person meetings and by telephone; (4) reviewing and correcting deposition transcripts; (5)  
 22 discussing issues in the case with their partners and sponsors; (6) responding to discovery  
 23 requests; (7) being available and providing assistance during mediations; (8) reviewing and  
 24 approving settlement terms; and (9) conferring regularly with counsel by telephone.

25       37. As low-income and immigrant clients, Plaintiffs also made substantial personal  
 26 sacrifices in devoting significant time and effort to this case. Plaintiffs had to take unpaid time  
 27 away from work and childcare responsibilities on numerous occasions over the course of the  
 28 litigation.

1       38. Plaintiffs also litigated this case on behalf of the Class despite the particularly  
 2 significant risks to themselves and their families. The four Plaintiffs are asylum seekers, or  
 3 family members of asylum seekers, facing immigration removal proceedings and litigating  
 4 claims against the company who secured their conditional release from immigration detention.

5       39. As Plaintiffs detail in their declarations, they nonetheless came forward to  
 6 represent the Class, despite their reasonable fears of immigration-related retaliation, potentially  
 7 leading to their re-detention or even deportation.

8       40. Plaintiffs also suffered significant personal trauma in highly sensitive client  
 9 meetings and contentious depositions. At the depositions, Plaintiffs had to describe in detail and  
 10 relive the conditions of their removal proceedings and detention, and face questions about their  
 11 own and their families' personal lives and immigration status. Plaintiffs bravely undertook these  
 12 risks despite being refugees who had already suffered violence in their countries of origin.

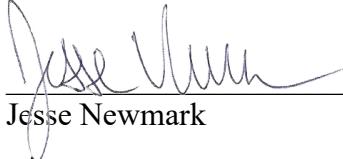
13       41. For these reasons, immigrant clients and their family members are often  
 14 understandably reluctant to participate in legal actions, particularly high-profile actions like the  
 15 national class action litigation here. This case in particular resulted in substantial media  
 16 coverage and broad dissemination of the Plaintiffs' names. Plaintiffs nonetheless chose to bring  
 17 and fully participate in this action, and thereby obtained critical relief for tens of thousands of  
 18 Class Members.

19       42. In agreeing to serve as Class Representatives, Plaintiffs also agreed to accept the  
 20 responsibilities of representing the interests of all Class Members, and forego their own individual  
 21 claims and potential recovery that may not have been limited by class certification issues or  
 22 solvency concerns. Plaintiffs therefore voluntarily and knowingly gave up individual recovery that  
 23 could have been substantially higher for Plaintiffs individually, but would have provided no relief  
 24 for the tens of thousands of Class Members.

25       43. In addition, by agreeing to a complete release of all known and unknown claims,  
 26 Plaintiffs' release of claims is substantially broader than those of the other Class Members.

27       44. For all of these reasons, the requested service awards of \$10,000 for each Plaintiff  
 28 are reasonable.

1 I declare under penalty of perjury under the laws of California that the foregoing is true  
2 and correct, and that this declaration was executed in Oakland, California, on September 1, 2020.  
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Jesse Newmark

# Exhibit A

Time Entry	Attorney	Date	Hours
Review and revise draft complaint	Aidin Castillo	02/01/2017	3.00
Call w/client GPO re: civil action	Aidin Castillo	02/03/2017	0.30
Call w/client JQV re: civil action	Aidin Castillo	02/03/2017	0.30
Confer w/Paul Chavez re: civil action	Jesse Newmark	02/03/2017	0.17
Call w/client GPO to schedule mtg and call to review and sign retainer	Aidin Castillo	02/06/2017	0.20
Call w/client JQV to schedule mtg and call to review and sign retainer	Aidin Castillo	02/06/2017	0.20
Call w/Paul Chavez re: potential co-counsel, case development	Jesse Newmark	02/06/2017	0.50
Confer w/Paul Chavez, AC, and SL re: civil action	Jesse Newmark	02/06/2017	0.08
Review complaint, outline potential additional claims, and other issues	Jesse Newmark	02/06/2017	1.00
Review co-counsel agreement, confer w/Paul Chavez, AC, and SL on edits	Jesse Newmark	02/08/2017	0.25
Review client retainers, confer w/Paul Chavez and co-counsel re: filing, additional claim possibilities, etc.	Jesse Newmark	02/08/2017	0.42
Co-counsel agreement review, respond re: claim research	Jesse Newmark	02/08/2017	0.08
Client mtg. w/GPO and JQV; call with co-counsel to review retainers	Aidin Castillo	02/09/2017	0.80
Review and edit draft complaint, summary of clients' experiences	Aidin Castillo	02/09/2017	0.50
Final review co-counsel agreement	Jesse Newmark	02/09/2017	0.08
Revise complaint, confer w/AC, Paul Chavez, and co-counsel re: substantive changes and EOIR memo	Jesse Newmark	02/09/2017	1.67
Confer w/co-counsel re: filing and release timing	Jesse Newmark	02/09/2017	0.08
Review ICE documents re: LBN policies and re-detention	Jesse Newmark	02/09/2017	0.25
Call with client GPO	Aidin Castillo	02/10/2017	0.30
Call with client JQV	Aidin Castillo	02/10/2017	0.30
Confer w/DS, AC, Paul Chavez re: FDCA claim	Jesse Newmark	02/10/2017	0.25
Confer w/Paul Chavez re: Does option, respond to co-counsel	Jesse Newmark	02/13/2017	0.17
Confer w/AC re: client declaration meetings, respond to co-counsel	Jesse Newmark	02/13/2017	0.25
Corr. w/intake re: client declaration meetings	Jesse Newmark	02/13/2017	0.08
Discuss complaint review and claims w/SL	Jesse Newmark	02/14/2017	0.08
Meet with client GPO to sign venue declaration, schedule client JQV	Jesse Newmark	02/14/2017	0.25
Meet with client JQV, review and sign declaration	Jesse Newmark	02/14/2017	0.25
Scan and send declarations to co-counsel	Jesse Newmark	02/14/2017	0.17
Download filed complaint, check EM/ECF	Jesse Newmark	02/15/2017	0.08
Download and review initial court order, calendar dates, confer w/co-counsel re: magistrate judge and options	Jesse Newmark	02/17/2017	0.33
Review complaint, discuss w/JN	Shira Levine	02/20/2017	1.00
Confer w/AC re: additional plaintiff contacts and other investigations	Jesse Newmark	02/23/2017	0.17
Meet w/AC and confer w/co-counsel re: protective order, client comm., and potential contacts, follow-up w/AC	Jesse Newmark	02/28/2017	0.25
Corr. w/AC re: client calls re: contact	Jesse Newmark	03/01/2017	0.08
Call from JQV regarding ankle monitor	Aidin Castillo	03/03/2017	0.40
Call with LBN regarding ankle monitor	Aidin Castillo	03/03/2017	0.30
Call to LBN regarding ankle monitor	Aidin Castillo	03/03/2017	0.10
Confer w/staff and co-counsel re: ankle monitor	Aidin Castillo	03/03/2017	0.50
Confer w/staff and co-counsel re: ankle monitor	Aidin Castillo	03/03/2017	0.40
Confer w/AC re: plaintiff outreach	Jesse Newmark	03/07/2017	0.08
Call to LBN regarding ankle monitor	Aidin Castillo	03/08/2017	0.10
Emails re: new potential plaintiffs, discuss with Lisa Knox	Shira Levine	03/21/2017	0.20
Review potential additional plaintiffs, resp. to SL, AC, and Lisa Knox	Jesse Newmark	03/23/2017	0.17
Corr. w/staff re: consultant	Jesse Newmark	04/10/2017	0.08
Client call	Aidin Castillo	04/11/2017	0.20
Edits to second amended complaint	Aidin Castillo	04/11/2017	2.80
Discuss strategy w/SL	Jesse Newmark	04/11/2017	0.17
Edits to second amended complaint	Aidin Castillo	04/13/2017	1.60
Corr. w/consultant	Jesse Newmark	04/13/2017	0.08
Review and revise amended complaint, incl. bond revocation issue, FOIA docs	Jesse Newmark	04/13/2017	1.00
Preparation for letter to LBN	Shira Levine	04/13/2017	0.20
Confer w/staff re: letter to LBN	Shira Levine	04/13/2017	0.20
Draft letter to LBN re payments, research agent for service of process	Shira Levine	04/13/2017	0.60
Confer w/co-counsel re: judicial assignment	Jesse Newmark	04/13/2017	0.08
Discuss letter w/SL, review and revise letter, corr. re: service	Jesse Newmark	04/13/2017	0.50
Send payment letter to opposing counsel	Shira Levine	04/13/2017	0.20
Confer w/co-counsel re: letter	Jesse Newmark	04/14/2017	0.08
Confer w/LK re: letter	Shira Levine	04/14/2017	0.20
Confer w/consultant re: case, incl. potential claim	Jesse Newmark	04/19/2017	0.17
Research state claims for first amended complaint	Jesse Newmark	04/19/2017	1.50
Research state claims for first amended complaint, prepare memo, send to co-counsel	Jesse Newmark	04/19/2017	2.25
Discuss forced labor and labor code issue w/Derek Schoonmaker	Jesse Newmark	04/19/2017	0.25
Prepare FOIA request	Aidin Castillo	04/20/2017	0.50
FOIA request	Aidin Castillo	04/20/2017	0.50
Review additional claims	Shira Levine	04/21/2017	0.30
Confer w/consultant re: potential claims	Jesse Newmark	04/24/2017	0.50
Revise FAC, confer w/CA re: federal FDCPA, other issues	Jesse Newmark	04/24/2017	0.50
Research confidentiality issues, confer w/co-counsel	Jesse Newmark	04/27/2017	0.50
Confer w/co-counsel re: ADR approval, first amended complaint signatures, mediation options	Jesse Newmark	05/01/2017	0.17
Calls to clients re ADR permission, confer w/staff and co-counsel	Shira Levine	05/01/2017	0.80

Time Entry	Attorney	Date	Hours
Confer w/staff and co-counsel re ADR and clients	Shira Levine	05/01/2017	0.20
Review opposing counsel motion to dismiss email, brief research and response on civil code 1632	Jesse Newmark	05/04/2017	0.25
Research on additional state claims, email about additional state claims	Shira Levine	05/05/2017	1.20
Confer w/SL and AC re: related case	Jesse Newmark	05/08/2017	0.25
Research on related case	Shira Levine	05/08/2017	1.30
Research additional claims	Shira Levine	05/08/2017	0.50
Research additional claims	Shira Levine	05/12/2017	0.30
Revise case management conference statement	Shira Levine	05/15/2017	0.50
Confer w/SL re: additional claims, respond to co-counsel	Jesse Newmark	05/16/2017	0.17
Call w/co-counsel and opposing counsel re: case management conference	Shira Levine	05/16/2017	0.50
Email to opposing counsel about ankle monitor	Aidin Castillo	05/17/2017	0.30
Discuss ankle monitor remove w/AC	Shira Levine	05/17/2017	0.20
Confer w/co-counsel re: case management conference coordination	Shira Levine	05/18/2017	0.20
Review comments on additional claims, confer w/co-counsel	Jesse Newmark	05/22/2017	0.25
Case management conference	Shira Levine	05/23/2017	2.00
Drafting requests for production of documents re: arbitration agreement	Shira Levine	05/24/2017	2.00
Arbitration law research	Shira Levine	05/25/2017	1.30
Emails re: claims	Shira Levine	05/25/2017	0.50
Call re: arbitration, claims	Shira Levine	05/25/2017	0.30
Confer w/SL re: case management conference	Jesse Newmark	05/25/2017	0.17
Review deposition scheduling and arbitration issue discussion	Jesse Newmark	05/25/2017	0.08
Confer w/co-counsel re: dismissing claims	Jesse Newmark	05/25/2017	0.25
Confer w/co-counsel re: dismissing claims	Jesse Newmark	05/26/2017	0.17
Reviewing complaint, comments	Shira Levine	05/26/2017	0.50
Review court order, add case deadlines	Jesse Newmark	05/26/2017	0.25
Scans and emails re discovery	Shira Levine	06/06/2017	0.30
Research asylum confidentiality laws	Aidin Castillo	06/07/2017	1.00
Review corr. re: upcoming deposition and arbitration research, corr. w/SL on arbitration	Jesse Newmark	06/07/2017	0.17
Emails re: arbitration research	Shira Levine	06/07/2017	0.20
Confer w/AC re: RFP documents	Shira Levine	06/08/2017	0.20
Schedule call	Shira Levine	06/08/2017	0.10
Revise RFPs	Aidin Castillo	06/12/2017	0.60
Discuss client w/SL	Aidin Castillo	06/12/2017	0.50
Research and draft memo on arbitration and language	Shira Levine	06/12/2017	2.00
Call re: depositions	Shira Levine	06/12/2017	0.30
Call w/AC to prepare for depositions	Shira Levine	06/12/2017	0.30
Revise and send disclosures	Shira Levine	06/12/2017	0.30
Call client re: deposition representation, discuss case, confer w/co-counsel	Shira Levine	06/12/2017	0.50
Review corr. re: deposition issue	Jesse Newmark	06/12/2017	0.08
Call w/AC re: client and representation	Shira Levine	06/13/2017	0.50
Confer w/co-counsel re: deposition issue	Shira Levine	06/13/2017	0.10
Call to client re: deposition representation	Shira Levine	06/13/2017	0.10
Calls to clients re: deposition representation	Shira Levine	06/13/2017	0.20
Call to client re: deposition representation	Shira Levine	06/14/2017	0.30
Initial research on arbitration challenge, confer w/SL	Jesse Newmark	06/15/2017	0.25
Research on arbitration, language, civil code 1632, and unconscionability	Shira Levine	06/15/2017	4.00
Discuss arbitration research w/JN	Shira Levine	06/16/2017	0.30
Client and partner meeting to assess deposition representation	Shira Levine	06/19/2017	1.50
Draft summary re: client meeting	Shira Levine	06/19/2017	0.30
Draft memo on arbitration	Shira Levine	06/19/2017	4.00
Confer w/SL re: client deposition preparation meeting, and arbitration research	Jesse Newmark	06/19/2017	0.25
Met with clients JQV and NPR to prepare documents for disclosure	Aidin Castillo	06/20/2017	0.80
Review SL arbitration research memo	Jesse Newmark	06/20/2017	0.25
Revise memo	Shira Levine	06/20/2017	0.20
Confer w/co-counsel and SL-AC re: plaintiff discovery and deposition preparation scheduling	Jesse Newmark	06/20/2017	0.17
Emails re: deposition preparation	Shira Levine	06/20/2017	0.10
Emails re: coordinating deposition preparation	Shira Levine	06/20/2017	0.10
Corr. w/co-counsel re: deposition dates	Jesse Newmark	06/21/2017	0.08
Schedule deposition preparation with clients	Shira Levine	06/21/2017	0.60
Met with client VCM to prepare documents for disclosure	Aidin Castillo	06/22/2017	0.50
Confer w/SL and AC on deposition preparation scheduling and coverage	Jesse Newmark	06/22/2017	0.25
Meet w/AC re: deposition preparation	Shira Levine	06/22/2017	0.50
Reschedule deposition preparation	Shira Levine	06/22/2017	0.10
Review 30b6 deposition summary, confer w/co-counsel	Jesse Newmark	06/22/2017	0.17
Confer w/AC, SL, and co-counsel re: preparation calls and rescheduling	Jesse Newmark	06/22/2017	0.17
Client call with JQV about deposition preparation scheduling	Aidin Castillo	06/23/2017	0.20
Conf. w/SL re: arbitration research	Jesse Newmark	06/23/2017	0.08
Confer w/SL re: cosigner deposition dates	Jesse Newmark	06/23/2017	0.17
Schedule depositions and deposition preparation	Shira Levine	06/23/2017	0.70
Confer w/AC, SL, and AP re: co-signer deposition dates	Jesse Newmark	06/26/2017	0.17

Time Entry	Attorney	Date	Hours
Confer w/co-counsel and staff re: plaintiff deposition coverage	Jesse Newmark	06/26/2017	0.17
Confer w/AC re: co-signer deposition coverage and partner support	Jesse Newmark	06/26/2017	0.17
Confer w/AC re: client deposition preparation call coverage and logistics	Jesse Newmark	06/26/2017	0.25
Confer w/staff re: case status and research tasks	Jesse Newmark	06/27/2017	0.25
Confer w/co-counsel and AC re: co-signer depositions	Jesse Newmark	06/27/2017	0.17
Confer w/co-counsel and AC re: co-signer depositions	Jesse Newmark	06/27/2017	0.17
Confer w/AC re: deposition preparation outline and meeting	Jesse Newmark	06/27/2017	0.08
Revise outline, meet w/AC for client deposition preparation	Jesse Newmark	06/28/2017	1.25
Deposition preparation with AC and co-counsel (JQV)	Jesse Newmark	06/28/2017	1.50
Confer w/co-counsel on deposition preparation additions	Jesse Newmark	06/28/2017	0.08
Emails with co-counsel re: cosigner depositions	Aidin Castillo	06/30/2017	0.30
Prepare deposition preparation and coverage spreadsheet, calendar, and confer w/staff	Jesse Newmark	07/05/2017	0.50
Confer w/staff on deposition coverage dates	Jesse Newmark	07/06/2017	0.17
Confer w/SL and PC re: immigration status research and Rule 11	Jesse Newmark	07/06/2017	0.25
Research immigration status for depositions	Shira Levine	07/06/2017	1.00
Draft statement on immigration status	Shira Levine	07/07/2017	0.50
Confer w/staff and co-counsel re: deposition preparation coverage issues	Jesse Newmark	07/07/2017	0.17
Review law on immigration status discovery, confer w/SL	Jesse Newmark	07/07/2017	0.17
Call to interpreter re: scheduling deposition preparation	Aidin Castillo	07/10/2017	0.20
Client call re: deposition preparation	Aidin Castillo	07/10/2017	0.20
Deposition preparation	Aidin Castillo	07/10/2017	1.50
Review Rule 11 motion, confer w/co-counsel on response	Jesse Newmark	07/10/2017	0.25
Review and revise discovery deficiency letter	Jesse Newmark	07/10/2017	0.17
Deposition preparation organization	Shira Levine	07/10/2017	0.30
Corr. re: deposition coverage	Jesse Newmark	07/10/2017	0.08
Confer w/co-counsel re: deposition preparation	Jesse Newmark	07/10/2017	0.08
Client JQV deposition preparation	Jesse Newmark	07/10/2017	2.75
Confer w/AC re: scheduling client	Jesse Newmark	07/10/2017	0.17
Deposition client JQV	Aidin Castillo	07/11/2017	7.00
Client GPO deposition preparation	Aidin Castillo	07/11/2017	1.50
Corr. w/AP re: deposition meeting, corr. w/AC re: client call	Jesse Newmark	07/11/2017	0.17
Client JQV meeting and deposition	Jesse Newmark	07/11/2017	10.00
Deposition preparation with client GPO	Shira Levine	07/11/2017	3.00
Confer w/SL re: deposition and coverage	Jesse Newmark	07/11/2017	0.17
Confer w/co-counsel re: co-signer deposition preparation coverage	Jesse Newmark	07/11/2017	0.17
Review class representative duties on complaint knowledge	Jesse Newmark	07/11/2017	0.25
Client GPO deposition	Aidin Castillo	07/12/2017	8.00
Client GPO deposition (incl. commute)	Shira Levine	07/12/2017	9.50
Confer w/SL and Paul Chavez re: negotiation scheduling	Jesse Newmark	07/12/2017	0.25
Confer w/co-counsel re: co-signer deposition preparation availability and coverage	Jesse Newmark	07/12/2017	0.25
Confer w/co-counsel re: co-signer deposition preparation	Jesse Newmark	07/12/2017	0.08
Client VM deposition preparation	Shira Levine	07/12/2017	2.00
Confirm settlement meeting w/co-counsel and SL	Jesse Newmark	07/13/2017	0.08
Confer w/co-counsel re: fact investigation	Jesse Newmark	07/13/2017	0.25
VM deposition and transportation	Shira Levine	07/13/2017	10.00
Negotiations, monitor removal, client meeting (incl. commute)	Jesse Newmark	07/13/2017	3.92
Settlement meeting, monitor removal	Shira Levine	07/13/2017	2.00
KC deposition preparation	Aidin Castillo	07/14/2017	0.80
Client deposition preparation call	Aidin Castillo	07/14/2017	0.80
Client deposition preparation call	Shira Levine	07/14/2017	0.01
Client deposition preparation	Aidin Castillo	07/16/2017	1.30
Confer w/staff and co-counsel on deposition preparation and scheduling	Jesse Newmark	07/16/2017	0.50
Confer w/staff on meeting re: injunctive possibilities pursuant to settlement	Jesse Newmark	07/17/2017	0.08
Research proposed mediator, confer w/co-counsel	Jesse Newmark	07/17/2017	0.33
Review Rule 11 response, confer w/co-counsel	Jesse Newmark	07/17/2017	0.17
Confer w/co-counsel and staff on deposition defense for co-signers	Jesse Newmark	07/17/2017	0.50
Research proposed mediators, confer w/co-counsel	Jesse Newmark	07/17/2017	0.33
Confer w/co-counsel re: fact investigation	Jesse Newmark	07/17/2017	0.08
Confer w/co-counsel re: ADR coverage	Jesse Newmark	07/17/2017	0.08
Client deposition preparation call	Shira Levine	07/17/2017	0.20
Confer w/AC re: client deposition preparation	Shira Levine	07/17/2017	0.20
Confer w/staff for depositions and preparation	Shira Levine	07/17/2017	0.30
Confer w/AP re: deposition coverage	Jesse Newmark	07/17/2017	0.08
Client deposition	Aidin Castillo	07/18/2017	4.00
Deposition and preparation (incl. commute)	Jesse Newmark	07/18/2017	4.75
Client deposition preparation	Shira Levine	07/18/2017	2.00
Confer w/co-counsel re: ADR, call and mediator research	Jesse Newmark	07/18/2017	0.58
Client deposition preparation	Jesse Newmark	07/18/2017	2.00
Research deposition ethical issue	Jesse Newmark	07/18/2017	0.50
Meet w/client and partner about case and representation	Aidin Castillo	07/19/2017	1.50

Time Entry	Attorney	Date	Hours
Deposition (incl. preparation, commute, and follow up w/client)	Jesse Newmark	07/19/2017	5.00
Deposition (incl. preparation and commute)	Shira Levine	07/19/2017	4.50
Confer w/co-counsel re: fact investigation	Jesse Newmark	07/21/2017	0.08
Confer w/co-counsel re: settlement updates and meeting	Jesse Newmark	07/22/2017	0.17
Confer w/staff re: settlement issues	Jesse Newmark	07/23/2017	0.17
KC deposition	Aidin Castillo	07/24/2017	6.00
Confer w/staff re: injunctive settlement meeting and confidentiality	Jesse Newmark	07/24/2017	0.17
Confer w/AC re: deposition coverage and OIS objections	Jesse Newmark	07/24/2017	0.17
Confer w/staff re: injunctive relief and fact investigation	Jesse Newmark	07/25/2017	0.33
Confer w/co-counsel re: manager depositions	Jesse Newmark	07/25/2017	0.08
Review deposition summary, confer w/AC	Jesse Newmark	07/25/2017	0.08
Confer w/co-counsel re: initial mediation call, research mediator	Jesse Newmark	07/25/2017	0.33
Respond to co-counsel and staff re: fact investigation	Jesse Newmark	07/25/2017	0.17
Call re: co-signer depositions, amended complaint drafting, discovery	Jesse Newmark	07/26/2017	0.33
Call re: depositions and discovery	Shira Levine	07/26/2017	0.50
Confer w/staff re: fact investigation	Shira Levine	07/26/2017	0.30
Confer w/staff re: fact investigation	Jesse Newmark	07/26/2017	0.17
Schedule co-signer deposition	Jesse Newmark	07/26/2017	0.08
Confer w/staff re: fact investigation	Aidin Castillo	07/27/2017	1.00
Confer w/staff re: fact investigation	Jesse Newmark	07/27/2017	0.08
Meet w/staff re: fact investigation	Jesse Newmark	07/27/2017	1.00
Fact investigation	Jesse Newmark	07/27/2017	1.25
Fact investigation	Shira Levine	07/27/2017	1.00
Fact investigation	Shira Levine	07/27/2017	1.00
Confer w/JN re: fact investigation	Shira Levine	07/27/2017	0.50
Meet and confer phone call	Shira Levine	07/27/2017	0.50
Confer w/staff and co-counsel re: fact investigation	Jesse Newmark	07/27/2017	0.17
Confer w/AP re: custody issue	Jesse Newmark	07/28/2017	0.17
Confer w/Paul Chavez re: fact investigation	Jesse Newmark	07/28/2017	0.08
Legal research on bonds and analysis	Jesse Newmark	07/28/2017	0.50
Confer w/staff re: LBN meeting	Jesse Newmark	07/28/2017	0.25
Confirm client deposition and preparation coverage	Jesse Newmark	07/28/2017	0.17
Confer w/co-counsel and staff re: fact investigation, additional class representatives	Jesse Newmark	07/28/2017	0.17
Research LBN action, draft memo	Jesse Newmark	07/30/2017	0.92
Review draft stipulation for mediation, confer w/co-counsel and Paul Chavez	Jesse Newmark	07/31/2017	0.25
Email re: client deposition	Shira Levine	07/31/2017	0.10
Revise stipulation, add data and policy questions	Jesse Newmark	08/05/2017	0.33
Review stipulation, confer w/staff re: policy and strategy	Jesse Newmark	08/05/2017	0.25
Confer w/staff and counsel re: fact investigation	Jesse Newmark	08/07/2017	0.17
Review stipulated stay	Jesse Newmark	08/07/2017	0.08
Confer w/SL re: errata issue	Jesse Newmark	08/07/2017	0.08
Confer w/staff and co-counsel re: fact investigation	Jesse Newmark	08/07/2017	0.08
Send additional revisions for informal requests to AP	Jesse Newmark	08/08/2017	0.08
Fact investigation	Shira Levine	08/08/2017	0.50
Fact investigation	Jesse Newmark	08/09/2017	0.08
Confer re: deposition cancelation	Jesse Newmark	08/09/2017	0.08
Initial VDRP call	Jesse Newmark	08/10/2017	0.17
Confer w/co-counsel re: pre-mediation meeting w/LBN	Jesse Newmark	08/10/2017	0.17
Confer w/staff re: pre-mediation meeting and fact investigation	Jesse Newmark	08/10/2017	0.17
Confer w/staff re: pre-mediation meeting and fact investigation	Jesse Newmark	08/10/2017	0.17
Confer w/co-counsel re: pre-mediation meeting scheduling	Jesse Newmark	08/10/2017	0.08
Review corr. from assigned VDRP	Jesse Newmark	08/10/2017	0.08
Fact investigation	Jesse Newmark	08/14/2017	0.25
Confer w/SL and co-counsel re: deposition transcript review and translation	Jesse Newmark	08/14/2017	0.25
Confer w/SL re: fact investigation	Jesse Newmark	08/14/2017	0.17
Emails re deposition errata	Shira Levine	08/14/2017	0.20
Confer w/co-counsel re: mediation brief	Jesse Newmark	08/14/2017	0.25
Confer w/co-counsel re: errata extension and attorney review	Jesse Newmark	08/14/2017	0.17
Confer w/staff and co-counsel re: injunctive relief requests	Jesse Newmark	08/14/2017	0.17
Fact investigation	Jesse Newmark	08/15/2017	0.17
Fact investigation	Shira Levine	08/15/2017	1.00
Review deposition transcripts for errata	Shira Levine	08/15/2017	1.00
Fact investigation	Jesse Newmark	08/15/2017	0.08
Review deposition transcripts for errata	Shira Levine	08/16/2017	0.00
Review deposition transcripts for errata	Shira Levine	08/16/2017	0.38
Review deposition transcripts for errata	Shira Levine	08/16/2017	0.88
Fact investigation	Shira Levine	08/16/2017	1.30
Fact investigation	Jesse Newmark	08/16/2017	0.17
Fact investigation	Shira Levine	08/18/2017	2.50
Review deposition transcripts for errata	Shira Levine	08/18/2017	1.00

Time Entry	Attorney	Date	Hours
Confer w/co-counsel re: mediation schedule	Jesse Newmark	08/21/2017	0.08
Fact investigation	Shira Levine	08/21/2017	3.00
Fact investigation	Shira Levine	08/21/2017	0.80
Fact investigation	Jesse Newmark	08/22/2017	0.08
Fact investigation	Jesse Newmark	08/23/2017	0.17
Fact investigation	Jesse Newmark	08/23/2017	0.08
Confer w/AC re: deposition transcript review	Jesse Newmark	08/23/2017	0.08
Fact investigation	Shira Levine	08/23/2017	0.50
Fact investigation	Jesse Newmark	08/24/2017	0.17
Confer w/AC re: deposition transcript review	Shira Levine	08/25/2017	0.20
Fact investigation	Shira Levine	08/25/2017	1.50
Client call	Shira Levine	08/25/2017	0.10
Fact investigation, review mediation brief	Jesse Newmark	08/28/2017	0.08
Fact investigation	Alison Pennington	08/29/2017	1.50
Fact investigation	Aidin Castillo	08/29/2017	1.00
Fact investigation	Jesse Newmark	08/29/2017	0.08
Review complaint and injunctive relief options, prepare outline	Jesse Newmark	08/30/2017	1.50
Fact investigation	Shira Levine	08/30/2017	1.00
Fact investigation	Jesse Newmark	08/30/2017	0.17
Fact investigation	Alison Pennington	08/31/2017	2.50
Fact investigation	Aidin Castillo	08/31/2017	2.50
Fact investigation	Jesse Newmark	08/31/2017	2.50
Fact investigation	Shira Levine	08/31/2017	3.00
Confer w/staff re: policy changes	Jesse Newmark	08/31/2017	0.25
Confirm LBN meeting and location, confer w/staff	Jesse Newmark	08/31/2017	0.17
Confer w/AP re: updated mediation brief draft and compensation section	Jesse Newmark	08/31/2017	0.17
Confer w/staff re: mediation brief section drafting, and non-confidentiality	Jesse Newmark	08/31/2017	0.17
Confer w/co-counsel re: LBN meeting and pre-mediation call	Jesse Newmark	08/31/2017	0.08
Draft mediation brief	Shira Levine	08/31/2017	0.06
Fact investigation	Alison Pennington	09/01/2017	0.80
Fact investigation	Aidin Castillo	09/01/2017	0.80
Schedule mediation, review documents, confer w/staff	Jesse Newmark	09/01/2017	0.25
Confer w/staff re: mediation brief review and drafting	Jesse Newmark	09/01/2017	0.17
Revise and draft mediation brief	Jesse Newmark	09/01/2017	2.00
Confer w/staff and JT co-counsel re: LBN meeting and pre-meeting	Jesse Newmark	09/04/2017	0.25
Revise mediation brief	Jesse Newmark	09/04/2017	0.50
Fact investigation	Alison Pennington	09/06/2017	0.50
Revise mediation statement	Alison Pennington	09/07/2017	2.00
Revise mediation statement	Aidin Castillo	09/07/2017	0.80
Mediation planning meeting	Aidin Castillo	09/07/2017	1.00
Confer w/co-counsel re: mediation brief	Jesse Newmark	09/07/2017	0.25
Schedule meeting w/staff re: mediation brief review and LBN meeting	Jesse Newmark	09/07/2017	0.08
Confer w/co-counsel re: research on bond regs, etc.	Jesse Newmark	09/07/2017	0.17
Confer w/co-counsel re: fact investigation	Jesse Newmark	09/07/2017	0.25
Confer w/co-counsel potential class representatives	Jesse Newmark	09/07/2017	0.33
Revise mediation brief, confer w/staff	Jesse Newmark	09/07/2017	1.00
Call w/staff re: mediation brief edits and meeting with LBN	Jesse Newmark	09/07/2017	0.75
Fact investigation	Shira Levine	09/07/2017	1.50
Review and revise mediation brief	Shira Levine	09/07/2017	0.80
Confer w/co-counsel and corr. w/opposing counsel re: mediation cont.	Jesse Newmark	09/07/2017	0.25
Review mediation brief revisions, send to co-counsel	Jesse Newmark	09/07/2017	0.50
Confer w/co-counsel re: mediation date changes, other mediators	Jesse Newmark	09/08/2017	0.17
Confer w/co-counsel re: mediation date	Jesse Newmark	09/08/2017	0.08
Schedule new mediation dates, confer w/staff on attendance	Jesse Newmark	09/11/2017	0.17
Review deposition transcript	Shira Levine	09/11/2017	2.00
Confer w/co-counsel re: mediation scheduling	Jesse Newmark	09/12/2017	0.08
Confirm mediation date w/staff	Jesse Newmark	09/14/2017	0.08
Confer w/Paul Chavez re: potential class representative	Jesse Newmark	09/14/2017	0.08
Fact investigation	Jesse Newmark	09/19/2017	0.25
Fact investigation	Jesse Newmark	09/20/2017	0.08
Fact investigation	Jesse Newmark	09/22/2017	0.08
Fact investigation	Shira Levine	09/26/2017	0.30
Fact investigation	Jesse Newmark	09/26/2017	0.50
Confer w/staff re: LBN meeting and mediation attendance and preparation	Jesse Newmark	10/03/2017	0.25
Confer w/staff and co-counsel re: pre-LBN meeting, etc.	Jesse Newmark	10/05/2017	0.17
Confer w/staff re: pre-mediation meeting	Jesse Newmark	10/08/2017	0.08
Confer w/co-counsel re: pre-mediation meeting	Jesse Newmark	10/08/2017	0.08
Strategy session with co-counsel	Alison Pennington	10/09/2017	2.00
Meeting with LBN	Alison Pennington	10/09/2017	1.50
Meeting with LBN	Aidin Castillo	10/09/2017	2.00

Time Entry	Attorney	Date	Hours
Meeting with LBN and preparation	Shira Levine	10/09/2017	3.50
Review materials for LBN meeting	Jesse Newmark	10/09/2017	0.50
LBN meeting (incl. preparation and follow-up, and pre-meeting w/co-counsel)	Jesse Newmark	10/09/2017	4.75
Confer w/co-counsel and staff re: meeting and mediation	Jesse Newmark	10/09/2017	0.08
Mediation	Alison Pennington	10/10/2017	8.00
Mediation	Aidin Castillo	10/10/2017	6.00
Mediation (incl. preparation, commute, and follow up)	Jesse Newmark	10/10/2017	8.00
Mediation	Shira Levine	10/10/2017	0.14
Confer w/consultant re: bond research	Jesse Newmark	10/12/2017	0.08
Confer w/AP and co-counsel re: bond research, etc.	Jesse Newmark	10/12/2017	0.17
Confer w/consultant re: bond research	Jesse Newmark	10/13/2017	0.17
Confer w/co-counsel re: subpoena response	Jesse Newmark	10/16/2017	0.08
Fact investigation, confer w/co-counsel	Jesse Newmark	10/19/2017	0.17
Fact investigation, confer w/co-counsel	Jesse Newmark	10/19/2017	0.08
Fact investigation, confer w/co-counsel	Jesse Newmark	10/23/2017	0.25
Fact investigation, confer w/co-counsel	Jesse Newmark	10/24/2017	0.17
Fact investigation, confer w/staff	Jesse Newmark	10/24/2017	0.08
Fact investigation, confer w/staff	Jesse Newmark	10/24/2017	0.08
Review and confer w/co-counsel on mot. for protective order, etc.	Jesse Newmark	10/27/2017	0.50
Fact investigation	Alison Pennington	10/30/2017	1.50
Fact investigation	Aidin Castillo	10/30/2017	3.00
Fact investigation	Ana Henderson-Arij	10/30/2017	1.25
Fact investigation	Jesse Newmark	10/30/2017	0.08
Fact investigation	Ana Henderson-Arij	10/31/2017	2.00
Confer w/co-counsel re: various	Jesse Newmark	11/03/2017	0.17
Confer w/co-counsel re: various	Jesse Newmark	11/06/2017	1.00
Confer w/co-counsel re: various	Jesse Newmark	11/07/2017	0.08
Confer w/co-counsel re: response to opposing counsel re: mediation call	Jesse Newmark	11/08/2017	0.50
Confer w/co-counsel re: call to opposing counsel	Jesse Newmark	11/10/2017	0.25
Review notes from settlement call	Alison Pennington	11/17/2017	0.40
Confer w/co-counsel on materials; call w/opposing counsel re: proposal	Jesse Newmark	11/17/2017	1.08
Draft memo re: LBN proposal and next steps, schedule meeting	Jesse Newmark	11/17/2017	1.00
Confer w/AC re: fact investigation	Jesse Newmark	11/17/2017	0.17
Confer w/staff re: settlement response	Jesse Newmark	11/20/2017	0.17
Review settlement discussion notes	Alison Pennington	11/21/2017	0.40
Meet re: settlement	Alison Pennington	11/21/2017	1.50
Draft memo re: response to settlement offer, confer w/staff	Jesse Newmark	11/21/2017	1.50
Meet w/Paul Chavez, AP, and AC re: response to settlement offer	Jesse Newmark	11/21/2017	1.25
Memo to co-counsel re: settlement response	Jesse Newmark	11/21/2017	0.50
Call w/co-counsel re: response to settlement, etc.	Jesse Newmark	11/21/2017	1.50
Prepare notes from call and next steps on settlement response	Jesse Newmark	11/21/2017	0.25
Meet w/staff re: settlement strategy	Ana Henderson-Arij	11/21/2017	1.00
Discuss common fund issues w/DS	Jesse Newmark	11/21/2017	0.25
Confer w/co-counsel re: various	Jesse Newmark	11/22/2017	1.00
Fact investigation	Jesse Newmark	11/22/2017	0.25
Consultations re: common fund distribution issues	Jesse Newmark	11/27/2017	0.08
Review stip to cont., respond to co-counsel	Jesse Newmark	11/27/2017	0.17
Prepare and file notice of appearance; review standing order, local rules	Jesse Newmark	11/27/2017	1.00
Confer w/AP re: fact investigation	Jesse Newmark	11/28/2017	0.08
Review court scheduling order, update dates	Jesse Newmark	11/29/2017	0.17
Confer w/co-counsel re: various	Jesse Newmark	12/04/2017	0.17
Confer w/AP, AC, and Paul Chavez re: potential class representative	Jesse Newmark	12/06/2017	0.17
Confer w/co-counsel re: various	Jesse Newmark	12/06/2017	0.17
Confer w/staff re: review of new LBN contract	Jesse Newmark	12/06/2017	0.17
Confer w/AP and AC re: contract review, prepare memo on issues	Jesse Newmark	12/07/2017	0.17
Confer w/staff re: opposing counsel contact request	Jesse Newmark	12/07/2017	0.08
Confer w/co-counsel re: requesting opposing counsel contact, etc.	Jesse Newmark	12/08/2017	0.25
Confer w/co-counsel re: contract review	Jesse Newmark	12/08/2017	0.08
Confer w/co-counsel re: contact request	Jesse Newmark	12/11/2017	0.08
Confer w/co-counsel and staff re: contract review and mediation	Jesse Newmark	12/12/2017	0.08
Confer w/AP and AC re: contract review	Jesse Newmark	12/13/2017	0.08
Review LBN's new contracts	Alison Pennington	12/14/2017	2.00
Prepare analysis of LBN's new contracts	Alison Pennington	12/14/2017	3.00
Confer w/staff and co-counsel re: proposed mediation dates	Jesse Newmark	12/19/2017	0.17
Confer w/co-counsel re: mediation date	Jesse Newmark	12/19/2017	0.17
Corr. w/opposing counsel re: contact person; confer w/co-counsel	Jesse Newmark	12/29/2017	0.25
Review AP memo on contract changes, responses; review contracts; prepare calculations and chart for changes	Jesse Newmark	01/02/2018	2.08
Fact investigation	Jesse Newmark	01/03/2018	0.08
Confer w/staff re: contract changes and response	Jesse Newmark	01/04/2018	0.08

Time Entry	Attorney	Date	Hours
Fact investigation	Jesse Newmark	01/04/2018	0.08
Confer w/AC and AP re: additional calculations and response to co-counsel	Jesse Newmark	01/05/2018	0.25
Fact investigation	Jesse Newmark	01/08/2018	0.08
Draft memo re: LBN response and new contract; revise calculations and spreadsheet	Jesse Newmark	01/11/2018	2.42
Confer w/co-counsel and staff re: mediation dates and contract analysis	Jesse Newmark	01/12/2018	0.17
Finalize memos re: LBN contract and response and send to co-counsel, confer re: next steps	Jesse Newmark	01/12/2018	0.33
Confer w/staff re: potential class representative call	Jesse Newmark	01/19/2018	0.08
Confirm mediation date	Jesse Newmark	01/22/2018	0.08
Confer w/co-counsel re: potential class representative	Jesse Newmark	01/22/2018	0.08
Review proposed stipulation and order; confer w/co-counsel re: issues and analysis	Jesse Newmark	01/24/2018	0.33
Confer w/co-counsel and staff re: meeting on policy change issues	Jesse Newmark	02/02/2018	0.08
Confer w/staff re: call scheduling	Jesse Newmark	02/05/2018	0.08
Review and calendar new deadlines per court order	Jesse Newmark	02/05/2018	0.17
Strategy call with co-counsel	Alison Pennington	02/08/2018	0.50
Review policy change notes; conf. call w/co-counsel re: strategy for mediation, changes; viability of claims and remedies, incl. rescission	Jesse Newmark	02/08/2018	0.75
Confer w/AP and AC re: payment plans, meeting	Jesse Newmark	02/12/2018	0.25
Confer w/AC re: policy demands	Jesse Newmark	02/13/2018	0.08
Confer w/AP and AC re: payment plans, meeting	Jesse Newmark	02/14/2018	0.08
Confer w/staff and co-counsel re: payment plan meeting	Jesse Newmark	02/14/2018	0.17
Confer w/co-counsel re: meeting and fact investigation	Jesse Newmark	02/15/2018	0.17
Confer w/co-counsel re: rescheduled meeting; calendar	Jesse Newmark	02/15/2018	0.08
LBN new fee structure assessment	Aidin Castillo	02/19/2018	1.50
Confer w/AP re: fee structure and potential proposals, data needed; confer w/co-counsel re: conclusions and need for data	Jesse Newmark	02/20/2018	0.83
Confer w/AP re: appearance, draft notice	Jesse Newmark	02/21/2018	0.17
Call w/co-counsel re: mediation strategy and demands, discovery needs for settlement, arbitration strategy, rescission, etc.	Jesse Newmark	02/21/2018	0.67
Review prior requests and prepare updated request of items needed for mediation, draft email to opposing counsel, confer w/co-counsel	Jesse Newmark	02/28/2018	0.83
Confer w/co-counsel and staff re: LBN offer re: bonds	Jesse Newmark	03/01/2018	0.17
Draft response to LBN; confer w/co-counsel	Jesse Newmark	03/02/2018	0.17
Corr. w/opposing counsel re: info needed for mediation	Jesse Newmark	03/02/2018	0.25
Fact investigation	Jesse Newmark	03/02/2018	0.17
Fact investigation	Jesse Newmark	03/05/2018	0.08
Review opposing counsel corr.; confer w/co-counsel re: response	Jesse Newmark	03/07/2018	0.17
Fact investigation	Jesse Newmark	03/07/2018	0.08
Confer w/staff re: response to inquiries and LBN contact	Jesse Newmark	03/07/2018	0.08
Confer w/co-counsel re: informal discovery call	Jesse Newmark	03/07/2018	0.08
Corr. w/opposing counsel re: informal discovery call	Jesse Newmark	03/08/2018	0.17
Confer w/co-counsel and staff re: scheduling opposing counsel call	Jesse Newmark	03/14/2018	0.08
Confer w/co-counsel and staff re: scheduling opposing counsel call	Jesse Newmark	03/15/2018	0.08
Confer w/co-counsel and corr. w/opposing counsel re: informal discovery call	Jesse Newmark	03/16/2018	0.08
Corr. w/opposing counsel re: pre-mediation call	Jesse Newmark	03/19/2018	0.08
Pre-settlement call re: data	Aidin Castillo	03/20/2018	0.80
Preparation and call w/opposing counsel re: informal discovery / mediation, follow-up call w/staff and co-counsel	Jesse Newmark	03/20/2018	1.25
Draft memo to opposing counsel clarifying requests for info and responding to issues raised; confer w/co-counsel and staff	Jesse Newmark	03/21/2018	0.92
Revise and send memo to opposing counsel; confer w/co-counsel	Jesse Newmark	03/21/2018	0.33
Revise and send memo to opposing counsel; confer w/co-counsel	Jesse Newmark	03/21/2018	0.17
Review mediation statement	Aidin Castillo	03/26/2018	2.00
Confer w/co-counsel and staff re: meeting pre-mediation	Jesse Newmark	03/26/2018	0.17
Revise mediation statement, confer w/AC and AP	Jesse Newmark	03/26/2018	1.17
Review and revise mediation statement	Alison Pennington	03/27/2018	0.50
Strategy call with co-counsel	Alison Pennington	03/27/2018	1.25
Review corr. re: data questions, respond as to issues and strategy	Jesse Newmark	03/27/2018	0.17
Discuss mediation brief revisions w/AP and AC; revise and confer w/co-counsel	Jesse Newmark	03/27/2018	0.50
Confer w/co-counsel and staff re: mediation and brief	Jesse Newmark	03/27/2018	0.08
Review revised brief; confer w/co-counsel	Jesse Newmark	03/27/2018	0.08
Call w/co-counsel, preparation for mediation, etc.	Jesse Newmark	03/27/2018	1.33
Confer w/co-counsel re: call from opposing counsel and mediation	Jesse Newmark	03/28/2018	0.08
Mediation	Alison Pennington	03/29/2018	8.00
Mediation (incl. commute and preparation)	Jesse Newmark	03/29/2018	10.25
Fact investigation	Jesse Newmark	03/30/2018	0.08
Confer w/co-counsel re: potential class representative and strategy	Jesse Newmark	03/30/2018	0.17
Review mediator letter	Alison Pennington	04/03/2018	0.20
Review mediator letter; confer w/co-counsel and staff	Jesse Newmark	04/03/2018	0.33
Confer w/AP and AC re: mediation statement, strategy	Jesse Newmark	04/03/2018	0.50
Confer w/co-counsel re: claim research, licensing laws, LBN news, etc.	Jesse Newmark	04/03/2018	1.42

Time Entry	Attorney	Date	Hours
Review UCL law; confer w/co-counsel re: strategy	Jesse Newmark	04/06/2018	0.08
Confer w/AC and AP re: settlement decisions	Jesse Newmark	04/09/2018	0.33
Review co-counsel corr.; confer w/AP re: settlement issues	Jesse Newmark	04/09/2018	0.33
Confer w/co-counsel re: potential class rep	Jesse Newmark	04/10/2018	0.08
Confer w/co-counsel re: merits of UCL claim, injunctive relief, and strategy	Jesse Newmark	04/10/2018	0.33
Call w/co-counsel re: legal strategy and mediation efforts	Jesse Newmark	04/10/2018	1.33
Confer w/AP and AC re: legal strategy and continued mediation efforts	Jesse Newmark	04/10/2018	0.17
Corr. w/mediator re: extension request; respond to opposing counsel re: next steps	Jesse Newmark	04/10/2018	0.17
Confer w/AP, AC, and co-counsel re: settlement strategy, risk	Jesse Newmark	04/12/2018	0.17
Review settlement emails and notes from JN	Aidin Castillo	04/13/2018	1.50
Staff meeting on strategy	Alison Pennington	04/16/2018	1.00
Confer w/JN and AP re: settlement strategy	Aidin Castillo	04/16/2018	1.00
Draft memo on settlement and legal strategy	Jesse Newmark	04/16/2018	0.25
Confer w/AP and AC re: legal strategy and continued mediation decision	Jesse Newmark	04/16/2018	1.00
Confer w/co-counsel re: litigation/mediation decision, response to mediator and opposing counsel	Jesse Newmark	04/16/2018	0.58
Staff call on strategy	Alison Pennington	04/17/2018	0.50
Call with co-counsel about settlement response to mediator	Aidin Castillo	04/17/2018	0.50
Call w/co-counsel re: legal strategy and mediation efforts; draft response to mediator/opposing counsel, revise w/co-counsel	Jesse Newmark	04/17/2018	0.50
Finalize corr. to mediator and opposing counsel re: settlement	Jesse Newmark	04/17/2018	0.25
Staff email on strategy	Alison Pennington	04/23/2018	0.20
Review documents from related lawsuits; confer w/co-counsel	Jesse Newmark	04/23/2018	1.50
Review documents from related lawsuits; confer w/co-counsel	Jesse Newmark	04/23/2018	0.25
Review transcript from LBN article, confer w/co-counsel on subpoenas	Jesse Newmark	05/04/2018	0.25
Confer w/co-counsel re: potential class representative outreach and response	Jesse Newmark	05/11/2018	0.08
Confer w/AP and AC re: fact investigation	Jesse Newmark	05/22/2018	0.08
Confer w/AP and AC re: fact investigation	Jesse Newmark	05/23/2018	0.08
Confer w/co-counsel re: meeting re: various motions; schedule motions, review proposed briefing schedule and respond	Jesse Newmark	05/30/2018	0.33
Emails to schedule call and coordinate briefing	Aidin Castillo	06/04/2018	0.50
Staff call to coordinate briefing	Alison Pennington	06/05/2018	0.50
Staff call to coordinate briefing	Aidin Castillo	06/05/2018	1.00
Staff call to coordinate briefing	Jesse Newmark	06/05/2018	0.08
Review motions and confer w/co-counsel re: response and discovery	Jesse Newmark	06/05/2018	0.92
Brief research on translation legal issue, consultation	Jesse Newmark	06/06/2018	0.50
Consultations re: arbitration briefing	Jesse Newmark	06/07/2018	0.17
Research arbitration opp. args under state law; review contract, agreement, depositions; confer w/co-counsel re: arguments and steps (declarations, deposition review)	Jesse Newmark	06/08/2018	4.00
Research and drafting opp. to arbitration, consultation; confer w/staff and co-counsel	Jesse Newmark	06/11/2018	3.67
Research on procedural unconscionability	Alison Pennington	06/12/2018	2.00
Revise Rule 11 opposition, confer w/co-counsel	Jesse Newmark	06/12/2018	0.50
Consultation re: briefing	Jesse Newmark	06/12/2018	0.17
Confer w/co-counsel re: deadline and review	Jesse Newmark	06/12/2018	0.17
Confer w/staff re: deposition review	Jesse Newmark	06/12/2018	0.17
Research and outlining/drafting opposition to arbitration	Jesse Newmark	06/12/2018	5.08
Confer w/AP re: deposition summary, review	Jesse Newmark	06/13/2018	0.50
Additional research on substantive unconscionability factors	Jesse Newmark	06/13/2018	2.00
Finish drafting all sections, organizing unconscionability	Jesse Newmark	06/13/2018	4.00
Confer w/co-counsel re: unconscionability issues and strategy	Jesse Newmark	06/13/2018	0.50
Confer w/SL re: substantive unconscionability, application to entire contract	Jesse Newmark	06/13/2018	0.33
Client call	Aidin Castillo	06/15/2018	0.30
Confer w/AC re: client call	Jesse Newmark	06/15/2018	0.17
Confer w/co-counsel re: opposing counsel call	Jesse Newmark	06/15/2018	0.08
Confer w/co-counsel re: edits and restructuring of arbitration brief; review McGill section	Jesse Newmark	06/15/2018	0.33
Review and revisions to arbitration opposition, remove unconscionability arg., review declaration and add cites to translation and coverage arguments	Jesse Newmark	06/15/2018	1.00
Review declaration, AP memo, and client deposition, add cites to fraud section	Jesse Newmark	06/15/2018	2.33
Review deposition transcripts, re-draft fraud section, add cites; review and revise brief; confer w/co-counsel re: declarations, etc.	Jesse Newmark	06/16/2018	4.08
Review brief, add transcript citations	Aidin Castillo	06/18/2018	5.50
Confer w/AC re: cites and review edits	Jesse Newmark	06/18/2018	0.50
Review and revise opposition to arbitration, confer w/co-counsel re: brief and confidentiality	Jesse Newmark	06/18/2018	1.83
Revise cites to depositions	Jesse Newmark	06/18/2018	0.25
Final revisions and additions to deposition cites; confer re: signatures and filing	Jesse Newmark	06/18/2018	0.58
Revise brief, add transcript citations	Aidin Castillo	06/19/2018	1.50
Confer w/co-counsel re: review and filing	Jesse Newmark	06/19/2018	0.08
Confer w/AC re: client call	Jesse Newmark	06/19/2018	0.08
Respond to opposing counsel re: request	Jesse Newmark	06/19/2018	0.08
Confer w/SL re: bond alternatives, case impact	Jesse Newmark	06/20/2018	0.08
Review final opposition	Jesse Newmark	06/20/2018	0.08

Time Entry	Attorney	Date	Hours
Confer w/co-counsel re: client issue	Jesse Newmark	06/20/2018	0.08
Confer w/AC re: client call	Jesse Newmark	06/21/2018	0.08
Review opposing counsel corr., etc.	Jesse Newmark	06/21/2018	0.25
Confer w/AC re: client issues	Jesse Newmark	06/22/2018	0.08
Respond to opposing counsel re: request; confer w/co-counsel	Jesse Newmark	06/22/2018	0.17
Review opposing counsel corr., confer w/co-counsel and staff	Jesse Newmark	06/25/2018	0.17
Confer w/co-counsel and staff re: response	Jesse Newmark	06/27/2018	0.08
Corr. w/opposing counsel	Jesse Newmark	07/09/2018	0.17
Review of reply brief	Jesse Newmark	07/09/2018	0.17
Draft response to mediator, confer w/co-counsel re: response and oral argument coverage	Jesse Newmark	07/12/2018	0.25
Confer w/staff and co-counsel re: class representative, witness calls and scheduling discovery	Jesse Newmark	08/03/2018	0.17
Confer w/co-counsel and schedule call and agenda	Jesse Newmark	08/06/2018	0.17
Confer w/co-counsel and staff re: witnesses	Jesse Newmark	08/07/2018	0.08
Confer w/AC and AP re: witnesses	Jesse Newmark	08/08/2018	0.33
Response to email about client bond cancellation	Aidin Castillo	08/09/2018	0.50
Oral argument preparation call	Aidin Castillo	08/09/2018	0.50
Conf. call re: discovery, class member calls, and hearing preparation; follow-up w/staff	Jesse Newmark	08/09/2018	0.58
Confer w/staff re: strategy	Jesse Newmark	08/09/2018	0.08
Confer w/AC and AP re: hearing	Jesse Newmark	08/09/2018	0.08
Review motions for oral argument	Aidin Castillo	08/11/2018	1.50
Review co-counsel memo on motion to dismiss briefing, confer w/co-counsel re: briefs	Jesse Newmark	08/13/2018	0.58
Consultation re: tolling and discovery delay	Jesse Newmark	08/13/2018	0.67
Oral argument preparation: initial research on tolling and delayed discovery, brief memo to co-counsel	Jesse Newmark	08/13/2018	1.92
Oral argument preparation: initial research on FDCPA claim, incl. research on bond companies	Jesse Newmark	08/13/2018	1.92
Oral argument preparation: review all briefing and declarations	Jesse Newmark	08/13/2018	2.00
Oral argument preparation: confer w/co-counsel re: documents and review, research civil code 1632	Jesse Newmark	08/13/2018	1.08
Draft oral argument outline for motion to dismiss	Jesse Newmark	08/13/2018	1.83
Oral argument	Aidin Castillo	08/14/2018	2.50
Research McGill argument, confer w/co-counsel re: Blair	Jesse Newmark	08/14/2018	0.50
Draft oral argument outline for arbitration; final revisions and practice oral arg on both motions	Jesse Newmark	08/14/2018	2.67
Oral argument (incl. preparation and commute)	Jesse Newmark	08/14/2018	3.00
Confer w/co-counsel re: motion hearing	Jesse Newmark	08/14/2018	0.42
Client call	Aidin Castillo	08/15/2018	0.30
Confer w/co-counsel re: appeal and discovery, stay	Jesse Newmark	08/15/2018	0.17
Review court order on motion to dismiss, sanctions, arbitration; confer w/co-counsel	Jesse Newmark	08/20/2018	0.33
Confer w/staff and co-counsel re: deposition transcripts and client interviews	Jesse Newmark	08/28/2018	0.08
Confer w/co-counsel re: deadline to file amended tolling claim, strategy and argument	Jesse Newmark	08/31/2018	0.17
Calculate deadline, review court order and research law, prepare summary of amendments and questions for plaintiffs, confer w/co-counsel and staff	Jesse Newmark	09/04/2018	1.00
Confer w/co-counsel re: strategy on amending civil code 1632	Jesse Newmark	09/04/2018	0.17
Confer w/co-counsel and staff re: civil code 1632 strategy and client responses, initial review	Jesse Newmark	09/06/2018	0.33
Detailed review of client responses, confer w/co-counsel and staff re: additional questions and application of law to answers, alternative arguments and strategy	Jesse Newmark	09/07/2018	0.58
Confer w/co-counsel re: tolling, class certification, discovery; research and draft amended tolling filing	Jesse Newmark	09/10/2018	3.00
Confer w/AC re: additional facts	Jesse Newmark	09/10/2018	0.17
Confer w/co-counsel re: filing logistics	Jesse Newmark	09/10/2018	0.17
Confer w/co-counsel re: decision on amendment	Jesse Newmark	09/10/2018	0.25
Confer w/staff and co-counsel re: fact investigation	Jesse Newmark	09/13/2018	0.08
Review notices of appeal, confer w/co-counsel re: stay of proceedings, ongoing discovery; brief research on FAA/interlocutory	Jesse Newmark	09/18/2018	0.33
Confer w/co-counsel and staff re: fact investigation	Jesse Newmark	09/18/2018	0.17
Review appeal filing, briefing order; schedule and confer w/co-counsel	Jesse Newmark	09/19/2018	0.25
Confer w/co-counsel re: fact investigation	Jesse Newmark	09/20/2018	0.17
Confer w/co-counsel re: discovery review, damages models and experts	Jesse Newmark	09/20/2018	0.17
Confer w/co-counsel re: discovery requests, etc.	Jesse Newmark	09/26/2018	0.08
Confer w/AC and AP re: strategy	Jesse Newmark	09/26/2018	0.08
Review mediation form, confer w/co-counsel re: relating cases, etc.	Jesse Newmark	09/26/2018	0.17
Review mediation form, confer w/co-counsel	Jesse Newmark	09/26/2018	0.08
Confer w/co-counsel re: fact investigation	Jesse Newmark	09/27/2018	0.08
Confer w/co-counsel re: call scheduling	Jesse Newmark	10/01/2018	0.08
Confer w/AP re: fact investigation	Jesse Newmark	10/01/2018	0.08
Review motion to stay / permission to appeal, confer w/co-counsel	Jesse Newmark	10/09/2018	0.17
Confer w/co-counsel re: motions and call scheduling	Jesse Newmark	10/11/2018	0.08
Call scheduling	Jesse Newmark	10/16/2018	0.08
Review discovery, respond to damages model	Jesse Newmark	10/17/2018	0.33
Call w/co-counsel re: motions, extension, discovery; confer w/AP	Jesse Newmark	10/17/2018	0.50
Find and share sample motion to amend	Jesse Newmark	10/17/2018	0.08
Confer w/co-counsel re: hearing transcript	Jesse Newmark	10/18/2018	0.08
Confer w/co-counsel, review templates and local rules, start drafting motions to extend and shorten	Jesse Newmark	10/19/2018	1.25

Time Entry	Attorney	Date	Hours
Revise amended complaint; review third-party subpoenas; review emails and docket for timeline on motion to extend; confer w/co-counsel re: issues, next steps	Jesse Newmark	10/21/2018	2.75
Draft motion to extend, confer w/co-counsel	Jesse Newmark	10/22/2018	1.33
Confer w/co-counsel re: revisions and schedule to complete	Jesse Newmark	10/22/2018	0.08
Revise opposition to stay, confer w/co-counsel re: monitor removal, draft motion to extend	Jesse Newmark	10/23/2018	0.67
Draft motion to extend, confer w/co-counsel	Jesse Newmark	10/23/2018	0.83
Confer w/co-counsel re: strategy, meet and confer efforts	Jesse Newmark	10/24/2018	0.08
Confer w/co-counsel re: motions to extend and shorten	Jesse Newmark	10/24/2018	0.08
Review co-counsel edits to motion to extend, confer re: defendant response, timing, etc.	Jesse Newmark	10/25/2018	0.50
Research timing on L.R. 7-2 motion deadline, confer w/co-counsel	Jesse Newmark	10/25/2018	0.17
Revise motion to extend, amended complaint, and motion to amend	Jesse Newmark	10/25/2018	1.00
Confer w/co-counsel re: discovery responses	Jesse Newmark	10/26/2018	0.08
Confer w/co-counsel re: opposing counsel refusal to stipulate	Jesse Newmark	10/26/2018	0.08
Confer w/co-counsel re: UCL amendments	Jesse Newmark	10/26/2018	0.08
Revise motion for administrative relief, declaration, proposed order	Jesse Newmark	10/29/2018	0.25
Revise motion to amend	Jesse Newmark	10/29/2018	0.33
Confer w/co-counsel re: opposing counsel settlement outreach	Jesse Newmark	10/29/2018	0.08
Confer w/co-counsel re: mediation call, review reply in support of stay	Jesse Newmark	10/30/2018	0.25
Fact investigation	Aidin Castillo	10/31/2018	2.50
Confer w/co-counsel re: motion for administrative relief, mediation assessment call	Jesse Newmark	11/05/2018	0.08
Review mediation statement for new opposing counsel, and confer w/co-counsel re: opposing counsel settlement conversation, etc.	Jesse Newmark	11/05/2018	0.25
9th Cir. mediation call	Jesse Newmark	11/07/2018	0.50
Confer re: opposing counsel extension requests	Jesse Newmark	11/08/2018	0.08
Review of opposition to amend	Jesse Newmark	11/13/2018	0.08
Review order granting administrative relief, update deadlines, confer w/co-counsel, etc.	Jesse Newmark	11/14/2018	0.25
Review correspondence and confer w/co-counsel re: claims and strategy	Jesse Newmark	11/15/2018	0.08
Review correspondence and confer w/co-counsel re: claims and strategy	Jesse Newmark	11/15/2018	0.08
Confer w/co-counsel re: fact investigation	Jesse Newmark	11/19/2018	0.08
Confer w/co-counsel re: call to discuss settlement terms	Jesse Newmark	11/20/2018	0.08
Review reply brief	Jesse Newmark	11/20/2018	0.08
Call w/co-counsel re: settlement terms, case strategy, claims, etc.	Jesse Newmark	11/20/2018	0.50
Review court order denying stay, etc., confer w/co-counsel	Jesse Newmark	11/20/2018	0.17
Revise proposed settlement terms, confer w/co-counsel	Jesse Newmark	11/20/2018	0.33
Confer w/AP re: case status, settlement terms and review	Jesse Newmark	11/20/2018	0.50
Review AP edits to terms, confer re: updates	Jesse Newmark	11/20/2018	0.17
Mediation call	Jesse Newmark	11/21/2018	0.25
Incorporate AP edits to settlement terms, confer w/co-counsel; review final version	Jesse Newmark	11/21/2018	0.17
Corr. w/mediator re: follow-up call	Jesse Newmark	11/21/2018	0.08
Fact investigation	Jesse Newmark	11/27/2018	0.08
Fact investigation	Jesse Newmark	11/27/2018	0.08
Revise proposed terms, calculate impact for clients, confer w/AP; mediation call with 9th Cir.	Jesse Newmark	11/29/2018	2.00
Confer w/AP re: settlement terms review	Jesse Newmark	11/30/2018	0.08
Discuss term revisions and issues w/AP	Jesse Newmark	11/30/2018	0.50
Final review and comment revisions, confer w/co-counsel on terms	Jesse Newmark	11/30/2018	0.25
Review order on motion to amend, confer w/co-counsel re: call on settlement terms	Jesse Newmark	12/03/2018	0.17
Call w/AP and co-counsel re: settlement terms; revise terms	Jesse Newmark	12/04/2018	1.58
Confer w/co-counsel re: potential revision to pro rata distribution, calculate examples	Jesse Newmark	12/04/2018	0.17
Confer w/AC and AP re: review of defendant's response and meeting	Jesse Newmark	12/06/2018	0.08
Confer w/AP re: mediation call	Jesse Newmark	12/07/2018	0.08
Confer w/co-counsel re: meeting	Jesse Newmark	12/07/2018	0.08
Call w/co-counsel and staff	Alison Pennington	12/10/2018	1.00
Review proposed settlement terms, initial response draft	Jesse Newmark	12/10/2018	0.83
Confer w/AP re: settlement terms	Jesse Newmark	12/10/2018	0.33
Conf. call w/co-counsel re: settlement terms	Jesse Newmark	12/10/2018	1.00
Revise proposed settlement terms, confer w/co-counsel and AP, further revisions	Jesse Newmark	12/11/2018	1.00
Discuss proposed terms w/AP	Jesse Newmark	12/11/2018	0.25
Confer w/co-counsel re: total cap strategy	Jesse Newmark	12/11/2018	0.17
Confer w/AP re: potential class member follow-up	Jesse Newmark	12/11/2018	0.08
Negotiations (incl. preparation, commute, follow-up)	Jesse Newmark	12/12/2018	10.75
Research and review financial documents, confer w/co-counsel	Jesse Newmark	12/14/2018	0.33
Confer w/co-counsel re: accountant review	Jesse Newmark	12/17/2018	0.08
Confer w/co-counsel re: common fund, fee issues, policy change details and concerns, next steps	Jesse Newmark	12/17/2018	0.33
Discuss response to settlement term strategy with AP	Jesse Newmark	12/18/2018	0.08
Corr. w/opposing counsel re: concerns	Jesse Newmark	12/18/2018	0.50
Prepare settlement term response	Jesse Newmark	12/20/2018	0.75
Drafting revised terms, confer w/AP re: review	Jesse Newmark	12/22/2018	0.92
Confer w/AP re: proposed terms review; review and finalize draft, confer w/co-counsel	Jesse Newmark	01/03/2019	0.75
Confer w/co-counsel and AP re: reviewing terms	Jesse Newmark	01/04/2019	0.17
Fact investigation	Jesse Newmark	01/04/2019	0.08

Time Entry	Attorney	Date	Hours
Revise proposed terms, confer w/co-counsel	Jesse Newmark	01/05/2019	1.25
Conf. call re: LBN term sheet	Alison Pennington	01/07/2019	0.50
Call re: proposed terms, strategy	Jesse Newmark	01/07/2019	0.67
Corr. w/opposing counsel	Jesse Newmark	01/07/2019	0.08
Fact investigation, confer w/co-counsel	Jesse Newmark	01/08/2019	0.17
Fact investigation, confer w/co-counsel	Jesse Newmark	01/08/2019	0.08
Revise proposed terms, confer w/co-counsel re: issues (sponsor class, etc.)	Jesse Newmark	01/08/2019	0.58
Confer w/co-counsel re: refund subclass issue; class representatives, etc.	Jesse Newmark	01/08/2019	0.17
Review co-counsel corr. w/opposing counsel; confer w/co-counsel	Jesse Newmark	01/08/2019	0.08
Review contracts for sponsor liability, confer w/co-counsel	Jesse Newmark	01/09/2019	0.25
Confer w/co-counsel re: sponsor liability	Jesse Newmark	01/09/2019	0.08
Confer w/co-counsel re: rescheduling; AP re: preparation	Jesse Newmark	01/10/2019	0.17
LBN negotiation call, revise term sheet outline, etc.	Jesse Newmark	01/11/2019	1.67
Confer w/AP re: I-391 drafting, etc.	Jesse Newmark	01/11/2019	0.08
Confer w/AP re: I-391 drafting, etc.	Jesse Newmark	01/14/2019	0.08
Confer w/co-counsel re: mediation call, rescheduling	Jesse Newmark	01/18/2019	0.08
Confer w/co-counsel re: fact investigation	Jesse Newmark	01/22/2019	0.08
Confer w/co-counsel and staff re: fact investigation	Jesse Newmark	01/24/2019	0.17
Call w/9th Cir. mediator	Jesse Newmark	01/24/2019	0.50
Review scheduling order, calendar new dates	Jesse Newmark	01/24/2019	0.08
Draft I-391 alternative and other language, confer w/AP on remaining issues	Jesse Newmark	01/28/2019	0.42
Schedule call w/AP re: I-391 / non-disparagement	Jesse Newmark	01/28/2019	0.08
Confer w/AP re: I-391 alternatives, revise; discuss non-disparagement issue	Jesse Newmark	01/29/2019	0.42
Confer w/AC and co-counsel re: fact investigation; client calls	Jesse Newmark	01/31/2019	0.25
Confer w/AP and co-counsel re: fact investigation; client calls	Jesse Newmark	01/31/2019	0.08
Fact investigation; client calls; confer w/co-counsel	Jesse Newmark	01/31/2019	0.25
Fact investigation; client calls; confer w/co-counsel	Jesse Newmark	02/01/2019	0.08
Fact investigation; client calls; confer w/co-counsel	Jesse Newmark	02/04/2019	1.00
Fact investigation	Jesse Newmark	02/04/2019	0.08
Confer w/co-counsel re: fact investigation, settlement strategy	Jesse Newmark	02/06/2019	0.17
Confer w/co-counsel re: fact investigation	Jesse Newmark	02/11/2019	0.08
Brief review of defendant's response to terms, confer w/co-counsel re: strategy	Jesse Newmark	02/14/2019	0.25
Review and compare settlement terms, outline response	Jesse Newmark	02/15/2019	1.00
Call w/co-counsel re: new terms, etc., response, mediation, update chart	Jesse Newmark	02/15/2019	0.67
Confer w/co-counsel re: potential mediators	Jesse Newmark	02/18/2019	0.08
Confer w/co-counsel re: opposing counsel response and mediation date	Jesse Newmark	02/19/2019	0.08
Revise terms, confer w/co-counsel	Jesse Newmark	02/19/2019	0.67
Review stipulation	Jesse Newmark	02/21/2019	0.08
Confer w/co-counsel re: settlement term review	Jesse Newmark	02/21/2019	0.08
Confer w/co-counsel re: subpoena response, and AP re: mediation	Jesse Newmark	02/25/2019	0.17
Review AP edits to terms, respond to LBN inquiry, review subpoena	Jesse Newmark	02/26/2019	0.25
Confer w/co-counsel re: subpoena and response	Jesse Newmark	02/27/2019	0.08
Review subpoena docs, confer w/co-counsel on release issues	Jesse Newmark	02/27/2019	0.17
Review I-391 language, revise terms, confer w/AP and co-counsel	Jesse Newmark	02/28/2019	0.92
Review term edits and prepare clean and redline versions	Jesse Newmark	03/01/2019	0.50
Call w/co-counsel re: term edits, other settlement issues	Jesse Newmark	03/01/2019	0.50
Confer w/co-counsel re: common fund	Jesse Newmark	03/01/2019	0.08
Confer w/co-counsel re: mediation call coverage	Jesse Newmark	03/05/2019	0.08
Confer w/co-counsel re: preparation for mediation	Jesse Newmark	03/07/2019	0.08
Revise mediation brief, confer w/co-counsel	Jesse Newmark	03/11/2019	0.83
Review final mediation brief, confer w/co-counsel	Jesse Newmark	03/12/2019	0.08
Review article, confer w/co-counsel and staff	Jesse Newmark	03/13/2019	0.25
Confer w/staff and co-counsel re: fact investigation	Jesse Newmark	03/14/2019	0.25
Mediation	Alison Pennington	03/15/2019	7.00
Mediation	Jesse Newmark	03/15/2019	9.00
Confer w/AP and co-counsel re: update on settlement discussions	Jesse Newmark	03/18/2019	0.08
Confer w/co-counsel and AP re: settlement response	Jesse Newmark	03/26/2019	0.17
Review LBN proposed settlement terms	Alison Pennington	03/27/2019	0.30
Confer w/co-counsel re: response to proposed terms; review defendant's response; prepare outline of changes and potential responses	Jesse Newmark	03/27/2019	0.83
Confer w/co-counsel and AP re: settlement response, next litigation steps (discovery, subpoenas, etc.)	Jesse Newmark	03/29/2019	0.92
Chart outstanding term disagreements and responses; draft counter-proposal term sheet; review opposing counsel corr. and confer w/co-counsel on next steps	Jesse Newmark	04/04/2019	2.83
Confer w/AC re: scheduling meeting	Jesse Newmark	04/05/2019	0.08
Team call	Alison Pennington	04/09/2019	1.00
Confer w/AP and AC re: settlement steps	Jesse Newmark	04/09/2019	0.17
Review subpoena response records, confer w/co-counsel	Jesse Newmark	04/09/2019	0.92
Confer w/co-counsel and staff re: next steps on discovery, subpoena response, settlement terms, etc.	Jesse Newmark	04/09/2019	1.17
Confer w/AP & AC re: settlement meeting	Jesse Newmark	04/10/2019	0.08
Confer w/co-counsel re: discovery correspondence	Jesse Newmark	04/10/2019	0.08

Time Entry	Attorney	Date	Hours
Meet to discuss term sheet	Alison Pennington	04/11/2019	2.00
Meet to discuss term sheet	Aidin Castillo	04/11/2019	1.00
Meet w/AC and AP re: settlement response, etc.	Jesse Newmark	04/11/2019	2.50
Review term sheet, compare versions, confer w/AP and AC	Jesse Newmark	04/11/2019	1.08
Review and revise proposed term sheet	Alison Pennington	04/12/2019	0.50
Review and confer w/AP and AC re: revised term sheet	Jesse Newmark	04/12/2019	0.17
Review co-counsel responded to terms; confer w/AP and AC re: edits	Jesse Newmark	04/15/2019	0.25
Review opposing counsel corr.; confer w/AP re: term sheet and remaining issues; fact investigation	Jesse Newmark	04/16/2019	0.50
Confer w/co-counsel re: fact investigation	Jesse Newmark	04/16/2019	0.08
Confer w/AP and co-counsel re: fact investigation	Jesse Newmark	04/17/2019	0.50
Call w/AP re: fact investigation	Jesse Newmark	04/17/2019	0.08
Fact investigation, confer w/staff and co-counsel on next steps; review docs	Jesse Newmark	04/17/2019	1.08
Confer w/co-counsel re: fact investigation	Jesse Newmark	04/17/2019	0.17
Confer w/AC re: fact investigation	Jesse Newmark	04/18/2019	0.08
Fact investigation	Jesse Newmark	04/18/2019	0.08
Fact investigation	Jesse Newmark	04/18/2019	0.25
Fact investigation	Jesse Newmark	04/22/2019	1.08
Confer w/co-counsel re: MTC	Jesse Newmark	04/22/2019	0.08
Confer w/co-counsel re: response to 9th Cir. mediator	Jesse Newmark	04/22/2019	0.08
Confer w/co-counsel re: 9th Cir. call	Jesse Newmark	04/23/2019	0.08
Confer w/AC & AP re: 9th Cir. mediation call	Jesse Newmark	04/24/2019	0.08
Confer w/AC re: fact investigation	Jesse Newmark	04/24/2019	0.17
Confer w/co-counsel re: new mediator strategy and dates	Jesse Newmark	04/25/2019	0.17
Discuss opposing counsel response w/AP, next steps for trial	Jesse Newmark	04/29/2019	0.17
Confer w/co-counsel and AP re: call w/opposing counsel on settlement terms, discovery letter	Jesse Newmark	05/01/2019	0.08
Fact investigation	Jesse Newmark	05/02/2019	0.42
Fact investigation	Jesse Newmark	05/02/2019	0.08
Review deposition decisions, confer w/co-counsel	Jesse Newmark	05/02/2019	0.08
Confer w/co-counsel re: fact investigation	Jesse Newmark	05/03/2019	0.08
Confer w/co-counsel re: mediation strategy; corr. w/opposing counsel on settlement response	Jesse Newmark	05/03/2019	0.17
Review opposing counsel response to discovery letter; confer w/co-counsel	Jesse Newmark	05/07/2019	0.17
Fact investigation	Alison Pennington	05/09/2019	1.00
Review M&C letter re: discovery; confer w/co-counsel re: settlement follow-up	Jesse Newmark	05/21/2019	0.17
Review opposing counsel correspondence, discovery meet and confer; confer w/co-counsel re: capacity, strategy, next steps	Jesse Newmark	05/24/2019	0.17
Confer w/co-counsel re: stay and settlement strategy; bond research; confer w/AP and AC	Jesse Newmark	05/24/2019	0.33
Confer w/co-counsel re: bond research, etc,	Jesse Newmark	05/29/2019	0.25
Confer w/co-counsel re: opposing counsel call on terms	Jesse Newmark	05/30/2019	0.17
Confer w/co-counsel re: fact investigation	Jesse Newmark	05/30/2019	0.17
Fact investigation	Jesse Newmark	05/30/2019	0.17
Review scheduling order, update dates and calendar	Jesse Newmark	05/30/2019	0.17
Confer w/co-counsel re: various	Jesse Newmark	05/30/2019	0.08
Confer w/co-counsel re: call w/opposing counsel	Jesse Newmark	05/30/2019	0.08
Review settlement term correspondence / terms, in preparation for call w/opposing counsel; confer w/co-counsel	Jesse Newmark	05/31/2019	0.25
Review settlement terms, chart, pre-call	Jesse Newmark	05/31/2019	0.08
Call w/opposing counsel re: terms, mediation, next steps; confer w/co-counsel re: call and fact investigation	Jesse Newmark	05/31/2019	1.08
Confer w/co-counsel re: fact investigation, subpoena	Jesse Newmark	05/31/2019	0.08
Confer w/AP re: fact investigation	Jesse Newmark	06/04/2019	0.08
Confer w/AP and co-counsel re: fact investigation	Jesse Newmark	06/11/2019	0.17
Fact investigation	Jesse Newmark	06/13/2019	0.08
Confer w/co-counsel re: mediation dates	Jesse Newmark	06/13/2019	0.17
Confer w/co-counsel re: mediation dates	Jesse Newmark	06/19/2019	0.08
Confer w/co-counsel re: mediation dates	Jesse Newmark	06/21/2019	0.08
Confer w/co-counsel re: mediation call coverage	Jesse Newmark	07/11/2019	0.08
Confer w/co-counsel re: mediation correspondence	Jesse Newmark	07/20/2019	0.08
Libre premediation call	Aidin Castillo	07/30/2019	0.30
Confer w/co-counsel re: post-settlement call w/opposing counsel	Jesse Newmark	08/01/2019	0.08
Schedule meeting, review terms, confer w/co-counsel re: opposing counsel response, mediation preparation	Jesse Newmark	08/05/2019	0.58
Revise mediation brief, confer w/co-counsel and AC re: terms, etc.	Jesse Newmark	08/07/2019	0.92
Revise term sheet, confer w/co-counsel	Jesse Newmark	08/09/2019	0.17
Review correspondence, confer w/co-counsel re: LBN call	Jesse Newmark	08/11/2019	0.42
Confer w/AC re: response to participant inquiries, contacts	Jesse Newmark	08/11/2019	0.25
Correspond w/opposing counsel re: other litigation	Jesse Newmark	08/11/2019	0.08
Fact investigation	Jesse Newmark	08/12/2019	0.17
Review terms, prepare comparison chart	Jesse Newmark	08/12/2019	0.67
Finalize comparison chart, confer w/co-counsel and AC re: issues for mediation	Jesse Newmark	08/12/2019	0.67
Meet w/JN to discuss settlement terms	Aidin Castillo	08/13/2019	0.30

Time Entry	Attorney	Date	Hours
Meet w/AC re: settlement terms, strategy	Jesse Newmark	08/13/2019	0.67
Confer w/co-counsel re: estimates, sharing mediation statement, monitoring	Jesse Newmark	08/13/2019	0.08
Confer w/co-counsel re: monitoring and mediation strategy	Jesse Newmark	08/13/2019	0.08
Correction to comparison chart, confer w/co-counsel and AC	Jesse Newmark	08/14/2019	0.08
Confer w/co-counsel re: mediation	Jesse Newmark	08/15/2019	0.08
Mediation	Aidin Castillo	08/16/2019	5.00
Mediation (including preparation and follow-up)	Jesse Newmark	08/16/2019	9.75
Discuss strategy and next steps w/AC	Jesse Newmark	08/19/2019	0.17
Confer w/co-counsel re: class representatives / sponsors	Jesse Newmark	08/19/2019	0.08
Lien research	Jesse Newmark	08/19/2019	0.08
Fact investigation	Jesse Newmark	08/22/2019	0.33
Confer w/AC re: mediation strategy	Jesse Newmark	08/22/2019	0.17
Review case strategy	Jesse Newmark	08/22/2019	0.75
Review draft settlement terms, pleadings, new contracts; assess terms, including monthly payment calculations	Jesse Newmark	08/27/2019	2.00
Confer w/co-counsel and AC re: settlement strategy, detailed assessment	Jesse Newmark	08/27/2019	0.33
Confer w/co-counsel and AC re: settlement strategy, other issues	Jesse Newmark	08/27/2019	0.58
Confer w/co-counsel and AC re: settlement strategy, other issues	Jesse Newmark	08/28/2019	0.33
Assessment of settlement terms, calculations, etc.; confer w/co-counsel	Jesse Newmark	08/28/2019	1.92
Assessment of settlement terms, calculations, etc., confer w/co-counsel	Jesse Newmark	08/28/2019	1.92
Confer w/co-counsel and revise data requests to opposing counsel	Jesse Newmark	08/28/2019	0.25
Review LBN documents produced, confer w/co-counsel	Jesse Newmark	08/28/2019	0.33
Confer w/co-counsel re: strategy; prepare list of issues	Jesse Newmark	08/28/2019	0.17
Review AG settlement, confer w/co-counsel	Jesse Newmark	08/28/2019	0.42
Review other litigation, confer w/co-counsel re: strategy	Jesse Newmark	08/28/2019	0.42
Confer w/co-counsel re: AG impact	Jesse Newmark	08/28/2019	0.08
Confer w/co-counsel re: defendant financial issues	Jesse Newmark	08/28/2019	0.08
Meet w/AC to review settlement terms, discuss remaining issues and strategy	Jesse Newmark	08/29/2019	1.75
Draft memo re: settlement terms, confer w/AC	Jesse Newmark	08/29/2019	0.67
Confer w/co-counsel re: outstanding terms	Jesse Newmark	08/29/2019	0.33
Confer w/co-counsel re: outstanding terms	Jesse Newmark	08/29/2019	0.33
Confer w/co-counsel re: strategy call, remaining terms	Jesse Newmark	08/29/2019	0.17
Confer w/co-counsel re: outstanding mediation terms, strategy	Jesse Newmark	08/29/2019	0.25
Confer w/co-counsel re: outstanding mediation terms, strategy	Jesse Newmark	08/29/2019	0.42
Confer w/co-counsel re: response to opposing counsel correspondence on mediation issues, term sheet, etc.	Jesse Newmark	08/29/2019	0.17
Confer w/AC re: call strategy	Jesse Newmark	08/29/2019	0.08
Draft memo re: remaining term issues to co-counsel	Jesse Newmark	08/30/2019	0.17
Call w/co-counsel re: remaining settlement terms, brief to mediator; follow-up on class representative and other case issues, missing contract and principals	Jesse Newmark	08/30/2019	1.00
Draft mediator memo on outstanding terms, clarifications, etc.; confer w/AC and co-counsel	Jesse Newmark	08/30/2019	1.83
Fact investigation	Jesse Newmark	08/30/2019	0.08
Confer w/co-counsel re: revisions to mediation brief	Jesse Newmark	08/30/2019	0.17
Revise settlement memo, confer w/AC	Jesse Newmark	08/30/2019	0.33
Confer w/staff re: settlement strategy	Jesse Newmark	08/30/2019	0.08
Confer w/staff re: settlement strategy, approval	Jesse Newmark	08/30/2019	0.08
Confer w/staff re: settlement strategy, approval	Jesse Newmark	09/01/2019	0.17
Review defendant's new term sheet and corr. w/mediator; revise spreadsheet, counter; memo to co-counsel re: outstanding issues; mediator call scheduling and strategy	Jesse Newmark	09/03/2019	2.17
Confer w/co-counsel re: settlement term revisions, strategy	Jesse Newmark	09/03/2019	0.33
Revise term sheets, confer w/co-counsel	Jesse Newmark	09/03/2019	0.75
Confer w/co-counsel and AC re: revisions, outstanding issues and strategy, class representatives	Jesse Newmark	09/03/2019	0.42
Call w/co-counsel and mediator	Jesse Newmark	09/03/2019	0.83
Review latest version of terms, confer w/co-counsel	Jesse Newmark	09/03/2019	0.17
Confer w/AC re: class representative follow-up; confer w/co-counsel re: remaining terms, response	Jesse Newmark	09/03/2019	0.33
Confer w/co-counsel, send final terms and explanation to mediator	Jesse Newmark	09/03/2019	0.25
Mediation	Aidin Castillo	09/04/2019	4.00
Mediation (incl. commute and preparation)	Jesse Newmark	09/04/2019	10.25
Confer w/co-counsel re: 9th Circuit call	Jesse Newmark	09/09/2019	0.08
Confer w/co-counsel re: settlement draft strategy, 9th cir. follow-up, etc.	Jesse Newmark	09/09/2019	0.08
Confer w/AC re: adding sponsor class representative	Jesse Newmark	09/12/2019	0.08
Confer w/AC re: adding sponsor class representative	Jesse Newmark	09/13/2019	0.08
Confer w/AC re: adding sponsor class representative	Jesse Newmark	09/16/2019	0.08
Confer w/co-counsel re: sponsor class representative	Jesse Newmark	09/17/2019	0.08
Review and revise retainer for sponsor	Jesse Newmark	09/17/2019	0.67
Review retainer revisions, confer w/co-counsel	Jesse Newmark	09/24/2019	0.08
Confer w/co-counsel, revise retainer	Jesse Newmark	09/24/2019	0.08
Review and revise joint stipulation / proposed order	Jesse Newmark	09/30/2019	0.17
Translate retainer, confer w/co-counsel	Jesse Newmark	09/30/2019	0.75
Confer w/co-counsel, revise retainer	Jesse Newmark	10/01/2019	0.08

Time Entry	Attorney	Date	Hours
Confer w/co-counsel re: retainer	Jesse Newmark	10/01/2019	0.08
Confer w/co-counsel re: call on notice	Jesse Newmark	10/01/2019	0.08
Confer w/AC re: fact investigation	Jesse Newmark	10/02/2019	0.08
Call w/opposing counsel re: notice, confer w/co-counsel on issues	Jesse Newmark	10/02/2019	0.58
Review court order granting stipulation, recalendar	Jesse Newmark	10/02/2019	0.08
Confer w/AC re: client confidentiality follow-up	Jesse Newmark	10/02/2019	0.08
Confer w/AC and co-counsel re: client contact and sponsor retainer	Jesse Newmark	10/03/2019	0.08
Confer w/AC re: class representative calls and adding sponsor	Jesse Newmark	10/09/2019	0.08
Confer w/AC, finalize retainer and confer w/co-counsel re: signing and confidentiality calls	Jesse Newmark	10/10/2019	0.17
Confer w/co-counsel re: fact investigation	Jesse Newmark	10/10/2019	0.08
Confer w/co-counsel re: fact investigation	Jesse Newmark	10/10/2019	0.08
Confer w/co-counsel re: settlement agreement review	Jesse Newmark	11/01/2019	0.08
Confer w/co-counsel re: settlement agreement review	Jesse Newmark	11/05/2019	0.08
Revise settlement agreement	Jesse Newmark	11/05/2019	0.92
Confer w/co-counsel re: settlement agreement revisions	Jesse Newmark	11/05/2019	0.08
Revise settlement agreement	Jesse Newmark	11/06/2019	1.42
Finalize settlement agreement revisions, compare to term sheet, confer w/co-counsel re: major substantive issues, confer w/AC re: review	Jesse Newmark	11/06/2019	1.83
Confer w/co-counsel and AC re: 2nd distribution, notice to attorneys	Jesse Newmark	11/07/2019	0.17
Revise settlement agreement, confer w/co-counsel re: outstanding issues	Jesse Newmark	11/08/2019	1.25
Review settlement agreement, confer w/co-counsel re: changes	Jesse Newmark	11/08/2019	0.17
Confer w/co-counsel re: opposing counsel call scheduling, review extension discussion	Jesse Newmark	11/13/2019	0.08
Call w/opposing counsel and co-counsel re: settlement agreement issues, next steps	Jesse Newmark	11/14/2019	0.58
Confer w/co-counsel re: publication notice	Jesse Newmark	11/14/2019	0.08
Revise mot. to amend and fourth amended complaint, research rules on leave when consent	Jesse Newmark	11/18/2019	0.83
Confer w/AC re: complaint review	Jesse Newmark	11/19/2019	0.08
Confer w/AC, review client transcripts, revise complaint for consistency, confer w/co-counsel	Jesse Newmark	11/19/2019	1.08
Confer w/AC re: complaint revisions	Jesse Newmark	11/19/2019	0.08
Confer w/co-counsel re: opposing counsel call	Jesse Newmark	11/26/2019	0.08
Call w/opposing counsel re: settlement issues, confer w/co-counsel re: next steps	Jesse Newmark	11/26/2019	0.58
Confer w/co-counsel re: postcard notice issues	Jesse Newmark	11/26/2019	0.08
Review proposed term sheet	Alison Pennington	12/12/2019	0.30
Confer w/co-counsel re: postcard notice, strategy w/opposing counsel	Jesse Newmark	12/12/2019	0.33
Confer w/co-counsel re: postcard notice, strategy w/opposing counsel	Jesse Newmark	12/13/2019	0.08
Review and revise settlement agreement, outline to co-counsel on changes and outstanding issues	Jesse Newmark	12/18/2019	2.08
Confer w/co-counsel on settlement agreement issues	Jesse Newmark	12/20/2019	0.17
Review corr. on deadline for court report, confer w/AC and co-counsel re: publication list	Jesse Newmark	01/06/2020	0.17
Confer w/AC re: locations for notice	Jesse Newmark	01/08/2020	0.08
Confer w/co-counsel re: notice / order review	Jesse Newmark	01/08/2020	0.08
Review joint status report and order	Jesse Newmark	01/09/2020	0.17
Revise class notice	Jesse Newmark	01/09/2020	1.17
Revise notice, compare w/settlement agreement, outline of edits to co-counsel	Jesse Newmark	01/10/2020	2.08
Revise proposed order, confer w/co-counsel	Jesse Newmark	01/16/2020	0.33
Review edits and revise class notice and postcard notice, confer w/co-counsel re: class definition issue	Jesse Newmark	01/21/2020	0.75
Confer w/AC and co-counsel re: listservs etc. for notice, strategy for including	Jesse Newmark	01/23/2020	0.17
Confer w/co-counsel re: settlement agreement review	Jesse Newmark	01/27/2020	0.08
Review term sheet, confer w/co-counsel re: administrative costs	Jesse Newmark	01/28/2020	0.17
Confer w/co-counsel re: settlement agreement review, motion timing	Jesse Newmark	01/29/2020	0.08
Research and confer w/AC re: cy pres recipients	Jesse Newmark	01/29/2020	0.25
Revise settlement agreement	Jesse Newmark	01/29/2020	0.25
Revise settlement agreement, compare versions, memo to co-counsel, confer w/AC re: outstanding issues	Jesse Newmark	01/29/2020	1.42
Confer w/AC and co-counsel re: publication notice, revise settlement agreement	Jesse Newmark	01/30/2020	0.42
Confer w/AC re: notice review	Jesse Newmark	01/30/2020	0.08
Finish research on cy pres, confer w/AC and co-counsel	Jesse Newmark	01/30/2020	0.50
Revise settlement agreement, add cy pres; confer w/co-counsel	Jesse Newmark	01/30/2020	0.08
Review and revise class notices, confer w/co-counsel re: outstanding issues	Jesse Newmark	01/30/2020	0.75
Confer w/co-counsel re: settlement agreement revisions, response to opposing counsel	Jesse Newmark	02/03/2020	0.17
Revise preliminary approval motion, confer w/co-counsel	Jesse Newmark	02/07/2020	0.50
Revise preliminary approval motion, confer w/co-counsel	Jesse Newmark	02/09/2020	0.50
Confer w/co-counsel re: preliminary approval motion revisions, opposing counsel call	Jesse Newmark	02/10/2020	0.08
Revise preliminary approval motion, confer w/co-counsel	Jesse Newmark	02/10/2020	2.58
Call w/opposing counsel and co-counsel, follow-up	Jesse Newmark	02/10/2020	0.75
Confer w/co-counsel re: preliminary approval motion revisions; immigration listserve issue	Jesse Newmark	02/10/2020	0.08
Confer w/co-counsel re: listserve issue	Jesse Newmark	02/11/2020	0.08
Review stipulation, confer w/co-counsel	Jesse Newmark	02/14/2020	0.08
Confer w/AC re: publication issue from defendants, suggestions	Jesse Newmark	02/17/2020	0.25
Review proposed edits, make revisions, confer w/co-counsel	Jesse Newmark	02/17/2020	0.50
Confer w/AC re: publication issue, solutions; confer w/co-counsel re: final approval alternative	Jesse Newmark	02/18/2020	0.42
Confer w/AC and co-counsel re: class representative calls from LBN re: meeting, response	Jesse Newmark	02/18/2020	0.25

Time Entry	Attorney	Date	Hours
Confer w/co-counsel re: various issues	Jesse Newmark	02/18/2020	0.08
Call w/co-counsel re: delay, substantive settlement agreement issues	Jesse Newmark	02/19/2020	0.25
Call w/opposing counsel re: delays, substantive issues	Jesse Newmark	02/19/2020	0.42
Confer w/co-counsel re: publication issue	Jesse Newmark	02/19/2020	0.08
9th Cir. mediator call, confer w/co-counsel; confer w/AC re: publication / I-391 issues	Jesse Newmark	02/20/2020	0.33
Review and revise settlement agreement edits, confer w/co-counsel	Jesse Newmark	02/24/2020	0.33
Confer w/co-counsel re: delays	Jesse Newmark	02/28/2020	0.08
Confer w/co-counsel re: call w/opposing counsel	Jesse Newmark	03/01/2020	0.08
Review status report	Jesse Newmark	03/04/2020	0.08
Review proposed order edits, confer w/co-counsel	Jesse Newmark	03/06/2020	0.08
Review court order on mediation, confer w/co-counsel re: mediator follow-up	Jesse Newmark	03/09/2020	0.17
Confer w/co-counsel re: mediator follow-up	Jesse Newmark	03/09/2020	0.08
Confer w/co-counsel re: mediator communication	Jesse Newmark	03/10/2020	0.08
Confer w/co-counsel re: mediator update	Jesse Newmark	03/11/2020	0.08
Confer w/co-counsel re: mediation	Jesse Newmark	03/18/2020	0.08
Review LBN correspondence, confer w/AC	Jesse Newmark	03/23/2020	0.08
Confer w/co-counsel re: opposing counsel correspondence on mediation / COVID impact, response; initial review of term sheet enforceability	Jesse Newmark	03/25/2020	0.17
Review response confer w/co-counsel	Jesse Newmark	03/26/2020	0.08
Revise status report, review opposing counsel edits, confer w/co-counsel	Jesse Newmark	03/31/2020	0.25
Review court order on mediation / motion to enforce, confer w/co-counsel	Jesse Newmark	04/03/2020	0.08
Confer w/co-counsel re: mediation timing and strategy	Jesse Newmark	04/03/2020	0.08
Confer w/co-counsel re: mediation date, length, call	Jesse Newmark	04/06/2020	0.17
Call w/co-counsel re: mediation issues, motion to enforce, etc.	Jesse Newmark	04/07/2020	0.33
Confer w/co-counsel re: mediation scheduling	Jesse Newmark	04/09/2020	0.08
Review opposing counsel correspondence, status report	Jesse Newmark	04/10/2020	0.08
Calendar mediation	Jesse Newmark	04/13/2020	0.08
Confer w/co-counsel re: drafting mediation brief	Jesse Newmark	05/05/2020	0.17
Review documents in preparation for mediation brief	Jesse Newmark	05/05/2020	0.33
Review status conference statements, prior mediation brief, court orders, and email corr. in preparation for mediation brief	Jesse Newmark	05/05/2020	1.17
Draft and revise mediation brief	Jesse Newmark	05/05/2020	4.58
Confer w/co-counsel re: brief draft, mediation preparation	Jesse Newmark	05/05/2020	0.17
Compare final versions of documents	Jesse Newmark	05/05/2020	0.08
Review edits, confer w/co-counsel; review final mediation brief	Jesse Newmark	05/06/2020	0.25
Confer w/co-counsel re: mediation, motion to enforce	Jesse Newmark	05/12/2020	0.08
Mediation	Aidin Castillo	05/13/2020	6.50
Mediation, incl. drafting of orders / settlement agreement, research on motion to enforce, research on assets, data and prior contract, etc.	Jesse Newmark	05/13/2020	10.50
Confer w/co-counsel re: notice to court	Jesse Newmark	05/14/2020	0.08
Confer w/co-counsel re: preliminary approval motion timing, tasks	Jesse Newmark	05/14/2020	0.08
Review fourth amended complaint versions, confer w/co-counsel	Jesse Newmark	05/14/2020	0.17
Review joint status report, confer w/co-counsel, corr. w/opposing counsel	Jesse Newmark	05/15/2020	0.17
Review N.D. guidance on preliminary approval motion; revise class notice based on guidance and updated settlement agreement; revise additional notices, motion, order	Jesse Newmark	05/18/2020	3.42
Revise proposed final order	Jesse Newmark	05/21/2020	0.25
Revise final order, add injunctive relief, confer w/co-counsel	Jesse Newmark	05/21/2020	0.58
Revise preliminary approval motion	Jesse Newmark	05/21/2020	3.08
Revise preliminary approval motion	Jesse Newmark	05/21/2020	0.75
Revise preliminary approval motion, review N.D. guidelines, add comments and email memo to co-counsel	Jesse Newmark	05/22/2020	1.58
Review court orders on service awards and fees, confer w/co-counsel	Jesse Newmark	05/22/2020	0.50
Review settlement agreement exhibits, confer w/co-counsel on strategy	Jesse Newmark	05/22/2020	0.17
Confer w/co-counsel re: preliminary approval motion docs to opposing counsel; fact investigation	Jesse Newmark	05/22/2020	0.08
Call clients re: cy pres recipients	Aidin Castillo	05/25/2020	0.50
Confer w/AC re: cy pres issues, revise preliminary approval motion	Jesse Newmark	05/25/2020	0.17
Confer w/AC re: cy pres issues, revise preliminary approval motion	Jesse Newmark	05/26/2020	0.08
Confer w/AC re: time entries	Jesse Newmark	05/26/2020	0.08
Revise preliminary approval motion, add cy pres and minor changes; confer w/co-counsel on outstanding issues (representative declarations, lodestar, etc.)	Jesse Newmark	05/27/2020	0.33
Confer w/co-counsel re: fact investigation	Jesse Newmark	05/28/2020	0.08
Corr. w/opposing counsel, and confer w/co-counsel re: 9th Cir. mediation call	Jesse Newmark	05/29/2020	0.17
Confer w/co-counsel re: declaration	Jesse Newmark	05/29/2020	0.08
Review and edit declaration in support of preliminary approval	Aidin Castillo	06/01/2020	0.70
Revise opposing counsel edits to final order, review settlement agreement, confer w/co-counsel re: review and next steps (declaration drafting)	Jesse Newmark	06/01/2020	0.25
Confer w/AC re: hours, declaration, service award facts	Jesse Newmark	06/01/2020	0.33
Confer w/co-counsel re: declaration division	Jesse Newmark	06/01/2020	0.08
Research court fee orders	Jesse Newmark	06/01/2020	0.25
Confer w/co-counsel re: fee info needed for preliminary approval, provide sample language	Jesse Newmark	06/01/2020	0.25
Confer w/co-counsel re: strategy on multiple declarations	Jesse Newmark	06/01/2020	0.17

Time Entry	Attorney	Date	Hours
Time entry review	Jesse Newmark	06/01/2020	0.67
Review substantive work for declaration	Jesse Newmark	06/01/2020	0.67
Draft declaration	Jesse Newmark	06/01/2020	1.17
Review AC declaration revisions, confer	Jesse Newmark	06/01/2020	0.25
Revise co-counsel declaration in support of preliminary approval motion	Jesse Newmark	06/01/2020	0.92
Revise final approval order, review settlement agreement for compliance, confer w/co-counsel re: outstanding issues	Jesse Newmark	06/01/2020	1.00
Review settlement agreement with GPO and KC	Aidin Castillo	06/02/2020	0.50
Review settlement agreement with JQV	Aidin Castillo	06/02/2020	0.50
Review settlement agreement with VCM	Aidin Castillo	06/02/2020	0.50
Review final approval order, confer w/co-counsel re: outstanding issue on debt relief timing, review settlement agreement	Jesse Newmark	06/02/2020	0.33
Review preliminary approval motion revisions, add paragraph on admin selection, etc., based on opposing counsel's email, review guidelines for compliance	Jesse Newmark	06/02/2020	0.42
Revise administrator declaration, confer w/co-counsel re: class member estimate numbers	Jesse Newmark	06/02/2020	0.42
Revise co-counsel declarations in support of motion to amend and preliminary approval motion, confer re: lodestar guidelines	Jesse Newmark	06/02/2020	0.33
Review calculation guidelines, confer w/co-counsel re: data needed; review term sheet and settlement agreement, confer w/co-counsel on f/u w/opposing counsel	Jesse Newmark	06/02/2020	0.42
Finalize lodestar calculations, update matrix	Jesse Newmark	06/02/2020	0.58
Call w/opposing counsel re: preliminary approval motion issues (data, etc.); call w/co-counsel re: response and incorporating in preliminary approval motion, etc.	Jesse Newmark	06/02/2020	0.83
Initial outline of updated valuation section based on opposing counsel call, confer w/co-counsel	Jesse Newmark	06/02/2020	0.42
Respond to opposing counsel re: revisions to final approval order	Jesse Newmark	06/02/2020	0.17
Finalize declaration (service award section, etc.), confer w/AC re: review, and co-counsel	Jesse Newmark	06/02/2020	1.50
Final revisions and sign declaration in support of preliminary approval motion	Jesse Newmark	06/02/2020	0.17
Review, confer w/co-counsel, and corr. w/opposing counsel re: additional language for final approval order	Jesse Newmark	06/02/2020	0.17
Confer w/co-counsel re: client signatures, confer w/AC, finalize settlement	Jesse Newmark	06/02/2020	1.42
Final review and revisions to final approval order	Jesse Newmark	06/02/2020	0.33
Review and finalize preliminary approval order, confer w/co-counsel	Jesse Newmark	06/02/2020	0.33
Final review and revise preliminary approval motion (redraft valuation section, calculate numbers, etc.), confer w/co-counsel	Jesse Newmark	06/02/2020	1.75
Finalize proposed order, confer w/co-counsel	Jesse Newmark	06/02/2020	0.08
Download and review preliminary approval motion and motion to amend filings	Jesse Newmark	06/02/2020	0.17
Review LBN article, confer w/co-counsel	Jesse Newmark	06/03/2020	0.08
Review and confer w/AC re: fact investigation	Jesse Newmark	06/18/2020	0.17
Confer w/co-counsel re: fact investigation	Jesse Newmark	06/22/2020	0.08
Confer w/co-counsel re: fact investigation	Jesse Newmark	06/22/2020	0.08
Update co-counsel on call timing	Jesse Newmark	06/24/2020	0.08
Fact investigation, confer w/AC	Jesse Newmark	06/24/2020	0.58
Confer w/co-counsel re: various	Jesse Newmark	06/25/2020	0.08
Review file for preliminary approval hearing	Jesse Newmark	06/26/2020	0.08
Confer w/co-counsel and AC re: preliminary approval hearing coverage / attendance strategy	Jesse Newmark	07/15/2020	0.17
Confer w/co-counsel re: oral argument, etc.	Jesse Newmark	07/15/2020	0.17
Confer w/CC re: preliminary approval hearing	Aidin Castillo	07/20/2020	0.80
Call GPO re: LBN payment status	Aidin Castillo	07/20/2020	0.30
Call JQV re: LBN payment status	Aidin Castillo	07/20/2020	0.25
Call VCM re: LBN payment status	Aidin Castillo	07/20/2020	0.20
Confer w/co-counsel and AC re: oral argument	Jesse Newmark	07/20/2020	0.17
Confer w/AC re: preliminary approval hearing, documents for review; corr. w/court re: attendance	Jesse Newmark	07/20/2020	0.33
Review state AG settlements, LBN release on monitor removal, in preparation for preliminary approval	Jesse Newmark	07/20/2020	0.25
Review CA DOI settlement, confer w/co-counsel re: strategy; call rescheduling	Jesse Newmark	07/20/2020	0.25
Review preliminary approval, declarations, settlement, notices, and motion to amend, in preparation for preliminary approval hearing	Jesse Newmark	07/20/2020	1.92
Preliminary approval motion hearing	Aidin Castillo	07/21/2020	0.80
Review AG settlements, etc., confer w/co-counsel on strategy / comparison, notice issues, residual distribution, etc.	Jesse Newmark	07/21/2020	0.75
Preliminary approval hearing call w/co-counsel	Jesse Newmark	07/21/2020	0.83
Review prior assessments, data, and contracts from defendant; prepare assessment of economic impact of injunctive relief / incl. class representatives specifically	Jesse Newmark	07/21/2020	1.17
Confer w/co-counsel re: preliminary approval hearing coordination, opposing counsel call	Jesse Newmark	07/21/2020	0.08
Confer w/AC re: class representative settlement impact information for preliminary approval hearing	Jesse Newmark	07/21/2020	0.17
Call w/opposing counsel	Jesse Newmark	07/21/2020	0.33
Preliminary approval hearing	Jesse Newmark	07/21/2020	1.08
Confer w/co-counsel re: next steps on preliminary approval	Jesse Newmark	07/21/2020	0.25
Prepare rough transcript of hearing, outline of changes needed and strategy, confer w/co-counsel	Jesse Newmark	07/21/2020	1.58
Revise settlement agreement, amended complaint, and notices post-preliminary approval hearing, confer w/co-counsel re: changes, outstanding issues, and strategy	Jesse Newmark	07/21/2020	2.75
Confer w/co-counsel re: data from opposing counsel for comparison	Jesse Newmark	07/21/2020	0.25
Confer w/co-counsel re: final document versions for revisions, revise fourth amended complaint	Jesse Newmark	07/22/2020	0.17

Time Entry	Attorney	Date	Hours
Confer w/co-counsel re: preliminary order revisions, call w/opposing counsel, revise notices, and outline issues for opposing counsel call	Jesse Newmark	07/22/2020	0.67
Confer w/co-counsel re: debt relief issues, review settlement agreement revisions	Jesse Newmark	07/22/2020	0.17
Review proposed preliminary / final approval order revisions, confer w/co-counsel	Jesse Newmark	07/22/2020	0.25
Confer w/co-counsel re: call to opposing counsel	Jesse Newmark	07/22/2020	0.08
Call w/opposing counsel re: revisions and data needed for supplemental preliminary approval briefing	Jesse Newmark	07/22/2020	0.83
Confer w/co-counsel re: opposing counsel call, next steps	Jesse Newmark	07/22/2020	0.17
Draft summary of outstanding issues post-opposing counsel call, organize revised documents, confer w/co-counsel	Jesse Newmark	07/22/2020	0.42
Review and revise settlement agreement, confer w/co-counsel	Jesse Newmark	07/24/2020	0.67
Confer w/co-counsel re: outstanding settlement agreement issues	Jesse Newmark	07/24/2020	0.17
Revise settlement agreement, confer w/co-counsel re: outstanding issues, call, filing	Jesse Newmark	07/24/2020	0.75
Review settlement agreement revisions, confer w/co-counsel	Jesse Newmark	07/24/2020	0.17
Revise settlement agreement, confer w/co-counsel re: final issue on related claims	Jesse Newmark	07/24/2020	0.42
Draft supplemental brief, further settlement agreement and notice revisions, confer w/co-counsel	Jesse Newmark	07/24/2020	1.75
Draft supplemental brief, further settlement agreement and notice revisions, confer w/co-counsel	Jesse Newmark	07/24/2020	1.50
Draft supplemental brief, confer w/co-counsel	Jesse Newmark	07/26/2020	3.00
Review and revise supplemental brief, confer w/co-counsel re: notices	Jesse Newmark	07/27/2020	0.67
Confer w/co-counsel re: timetable edits, next steps	Jesse Newmark	07/27/2020	0.08
Review opposing counsel edits to agreement, notice, order, and brief; briefly research objector status; confer w/co-counsel	Jesse Newmark	07/28/2020	0.58
Confer w/co-counsel and AC re: next steps on submission, dates, edits, class representative execution, etc.	Jesse Newmark	07/28/2020	0.25
Revise agreement, confer w/co-counsel, corr. w/opposing counsel	Jesse Newmark	07/28/2020	0.50
Review detailed notice, confer w/co-counsel	Jesse Newmark	07/28/2020	0.08
Final revisions to agreement, corr. w/opposing counsel	Jesse Newmark	07/28/2020	0.33
Revise class notice	Jesse Newmark	07/28/2020	0.50
Revise postcard notice, confer w/AC re: Spanish revisions	Jesse Newmark	07/28/2020	0.33
Corr. w/opposing counsel and confer w/co-counsel re: final fairness hearing, review transcript, write and call court	Jesse Newmark	07/28/2020	0.50
Review valuation addition to status report, confer w/co-counsel	Jesse Newmark	07/28/2020	0.25
Confer w/co-counsel re: status report, review	Jesse Newmark	07/28/2020	0.17
Revise supplemental brief, add monthly refund, confer w/co-counsel	Jesse Newmark	07/28/2020	0.75
Review and finalize clean versions of documents for submission; revise proposed orders and notice dates; revise supplemental brief, confer w/co-counsel on next steps	Jesse Newmark	07/28/2020	1.75
Confer w/co-counsel re: supplemental brief, declaration, and notice revisions, prepare redline and finalize clean versions, corr. w/opposing counsel	Jesse Newmark	07/29/2020	1.17
Review and revise clean and redline exhibits, corr. w/opposing counsel, prepare publication notice, revise supplemental brief and declaration	Jesse Newmark	07/29/2020	1.17
Corr. w/opposing counsel re: response deadline	Jesse Newmark	07/29/2020	0.08
Revise supplemental brief and declaration confer w/co-counsel on additional calculations	Jesse Newmark	07/29/2020	0.33
Revise supplemental brief and declaration confer w/co-counsel on additional calculations	Jesse Newmark	07/29/2020	0.67
Review opposing counsel revisions, confer w/co-counsel	Jesse Newmark	07/29/2020	0.25
Incorporate opposing counsel revisions, prepare new versions, add exhibit sheets / parentheticals, corr. w/opposing counsel	Jesse Newmark	07/29/2020	0.58
Finalize agreement signatures, prepare executed combined documents, corr. w/opposing counsel	Jesse Newmark	07/29/2020	0.42
Revise supplemental brief and declaration, and debt relief addition, etc., revise fourth amended complaint, confer w/co-counsel	Jesse Newmark	07/29/2020	1.00
Last review and finalize filing, confer w/co-counsel	Jesse Newmark	07/29/2020	0.58
Prepare proposed order for email to court	Jesse Newmark	07/29/2020	0.17
Confer w/co-counsel, download filed versions	Jesse Newmark	07/29/2020	0.08
Fact investigation, confer w/co-counsel	Jesse Newmark	07/30/2020	0.17
Corr. w/court re: final fairness hearing	Jesse Newmark	07/30/2020	0.08
Review preliminary approval / motion to amend order, calendar dates, confer w/co-counsel	Jesse Newmark	07/31/2020	0.17
Confer w/co-counsel re: class notice, filing complaint, etc,	Jesse Newmark	08/05/2020	0.08
Review publication notice revisions, confer w/co-counsel	Jesse Newmark	08/18/2020	0.08
Confer w/AC re: fact investigation	Jesse Newmark	08/18/2020	0.08
Initial research on affirmative defense waiver; confer w/AC and co-counsel	Jesse Newmark	08/18/2020	0.50
Confer w/co-counsel re: defense waiver issue, fact investigation	Jesse Newmark	08/19/2020	0.17
Confer w/co-counsel re: defense waiver issue	Jesse Newmark	08/19/2020	0.17
Confer w/co-counsel re: response to alleged settlement agreement violations	Jesse Newmark	08/21/2020	0.17
Review opposing counsel corr. on notice issues; confer w/co-counsel re: proposed revisions, revise text notice	Jesse Newmark	08/21/2020	0.25
Confer w/co-counsel and corr. w/opposing counsel re: text notice revisions	Jesse Newmark	08/21/2020	0.25
Corr. w/opposing counsel re: alleged settlement agreement violations, contact	Jesse Newmark	08/21/2020	0.25
Review opposing counsel response on defense waiver issue, confer w/co-counsel on response / strategy	Jesse Newmark	08/21/2020	0.25
Review court order, confer w/co-counsel re: fee / service award application; strategy on review	Jesse Newmark	08/22/2020	0.25
Initial review publication notice translation, confer w/AC	Jesse Newmark	08/24/2020	0.17
Review time entries	Jesse Newmark	08/25/2020	4.00
Review time entries	Jesse Newmark	08/26/2020	0.67

Time Entry	Attorney	Date	Hours
Confer w/co-counsel re: response to opposing counsel on affirmative defense issue, strategy	Jesse Newmark	08/26/2020	0.58
Confer w/AC re: time entries, service award decl. facts	Jesse Newmark	08/26/2020	0.17
Review time entries	Jesse Newmark	08/26/2020	0.17
Confer w/co-counsel re: response to opposing counsel on affirmative defense issue, strategy	Jesse Newmark	08/26/2020	1.00
Review text notice translation, opposing counsel corr. on weblink	Jesse Newmark	08/27/2020	0.08
Review time entries, confer w/co-counsel re: fee motion	Jesse Newmark	08/27/2020	0.08
Prepare fee motion summary for declaration	Jesse Newmark	08/27/2020	0.67
Corr. w/opposing counsel re: affirmative defense issue	Jesse Newmark	08/27/2020	0.92
Prepare outline of client activities and questions for service awards; confer w/AC	Jesse Newmark	08/27/2020	0.25
Call client GPO re: declaration	Aidin Castillo	08/28/2020	0.20
Confer w/co-counsel re: fee motion review timing, service awards	Jesse Newmark	08/28/2020	0.42
Call client VCM re: declaration	Aidin Castillo	08/30/2020	0.20
Update AC time entries, confer w/AC	Jesse Newmark	08/30/2020	0.08
Revise fee and service award motion, confer w/co-counsel	Jesse Newmark	08/30/2020	0.25
Review prior fee and service award motions, preliminary approval declaration and motion	Jesse Newmark	08/30/2020	1.67
Draft declaration in support of final approval; confer w/co-counsel and AC re: client declarations, other issues	Jesse Newmark	08/30/2020	0.58
Call client JQV to prepare declaration	Aidin Castillo	08/31/2020	0.50
Call client GPO to prepare declaration	Aidin Castillo	08/31/2020	0.50
Call client VCM to prepare declaration	Aidin Castillo	08/31/2020	0.50
Call client KC to prepare declaration	Aidin Castillo	08/31/2020	0.50
Call client JQV to review declaration	Aidin Castillo	08/31/2020	0.30
Call client GPO to review declaration	Aidin Castillo	08/31/2020	0.30
Call client VCM to review declaration	Aidin Castillo	08/31/2020	0.30
Call client KC to review declaration	Aidin Castillo	08/31/2020	0.30
Review GPO activities	Jesse Newmark	08/31/2020	1.92
Prepare declaration for client GPO, confer w/co-counsel and AC	Jesse Newmark	08/31/2020	0.17
Corr. w/opposing counsel re: contact for issues	Jesse Newmark	08/31/2020	0.92
Confer w/co-counsel re: affirmative defense issue, response to inquiry	Jesse Newmark	08/31/2020	0.08
Confer w/co-counsel re: response to affirmative defense inquiry	Jesse Newmark	08/31/2020	0.08
Prepare declaration for client JQV, confer w/co-counsel and AC	Jesse Newmark	08/31/2020	0.08
Revise GPO declaration post-client call	Jesse Newmark	08/31/2020	0.75
Review co-counsel revisions to GPO declaration	Jesse Newmark	08/31/2020	0.42
Review prior service award orders, confer w/co-counsel	Jesse Newmark	08/31/2020	0.08
Review deposition transcripts, confer w/AC re: sponsor and partner depositions	Jesse Newmark	08/31/2020	0.17
Prepare declaration for client VCM, confer w/co-counsel and AC	Jesse Newmark	08/31/2020	0.33
Confer w/AC re: deposition review, signatures, follow-up re: client KC	Jesse Newmark	08/31/2020	0.83
Prepare declaration for client KC, confer w/AC	Jesse Newmark	08/31/2020	0.17
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